



## ANTI-BRIBERY POLICY STATEMENT

Bribery is the promising, giving, offering, accepting or requesting of an advantage as an incentive for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is Reflex's policy to conduct all of our business in an honest and ethical way. We take a zero-tolerance approach to bribery and corruption. We are totally committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, implementing, and enforcing effective systems to oppose bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010.

Bribery and corruption are punishable for individuals and can result in imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for contracts and face significant damage to our reputation. We therefore take our legal responsibilities very seriously.

This policy statement will be reviewed annually and published.

Signed on behalf of the Reflex Group Ltd.

I. Kendall

Managing Director

P. Pollard

Employee Relations & Business Compliance

Last Reviewed: March 2017

Next Review: March 2018