**Bell & Bain Limited Anti-Bribery Statement**

With regards to The Bribery Act 2010, we want to ensure our clients that we, as a business, are independently audited every twelve months and that there is a Board-Level understanding within Bell & Bain of the current relevant legislation. As such, we are active in preventing the offences within - namely the offering, promising or giving of a bribe, and the requesting, agreeing to receive or receiving of a bribe. The new offence created under this Act, relating specifically to the failure of commercial organisations to prevent their associated individuals/entities from committing bribery while representing them, is of course of equal concern to us. We only work with well-established suppliers that have the correct and relevant qualifications/experience/accreditations and ethos/business practices that are in line with our own. We also do our own regular due diligence with all our suppliers on an on-going and regular basis to ensure they adhere to the standards we set as part of our own in-house ISO procedures. The existence of such longstanding clients and such vast employee experience in the industry allows for the idea of bribery to never be even considered – a shared value from the top-down. We have in-house training and guidance to all appropriate and relevant staff which is aligned to their employment contracts. This has been a policy of Bell & Bain for many years.

Multiple approved signatures are needed for payments with an additional Managing Director signature needed for any amounts over a certain value and for any special payments to individuals as opposed to companies. An internal accounts approval system exists for any expenses claimed – needing approved and signed off as bona fide and within the Bell & Bain Ltd. allowance as well as always being backed up with correct and official receipt.

Copies of guidance regarding The Bribery Act 2010 are available and given to appropriate members of staff. As part of our ongoing training and continual staff development any updates to this act will be discussed annually or on an ad hoc basis. Internal procedures are in place for any employee to discuss with their line manager any incident through regular team and individual discussion. Bell & Bain would challenge legally or otherwise any attempt from a third party to obtain additional inducement from the company or company employee.

Occasional “hamper” type gift may be given from Bell & Bain to certain clients at Christmas if deemed both appropriate and is within both Bell & Bain and client approval, this type of gift is only given to companies and not individuals. Guests to our facilities may, when deemed appropriate, be taken to lunch or dinner and this will be viewed as a legitimate business expense.



Stephen Docherty  
Chairman