

ANTI BRIBERY POLICY

1st Edition

The board of directors has adopted a policy on compliance with the United States Foreign Corrupt Practices Act (“FCPA”) and the UK Bribery Act 2010 as well as other anti corruption laws. Including foreign laws, which are applicable to the Crescent Companies business activities.

The policy is a demonstration of the company’s commitment to maintaining the highest ethical standards in all aspects of our business including the prevention of bribery and corruption.

- The FCPA prohibits US companies and their affiliates, domestic and foreign, their directors, officers, employees or representatives from giving, paying, promising, offering or authorizing the payment either directly or indirectly through a third party, of anything of value to any foreign official.
- The UK Bribery Act 2010 creates four offenses: Offering, promising or giving a bribe: Requesting, agreeing to receive or accepting a bribe: Bribing a public official: and, A corporate offence of failing to prevent bribery.
- All company stakeholders are to comply fully with all applicable provisions of these Acts and all other applicable statutes, laws or conventions which seek to prohibit corrupt conduct.

In order to ensure that all stakeholders and representatives have all of the tools and resources necessary to understand and follow this Policy, the board of directors have mandated the development and implementation of an Anti Bribery and Corruption Compliance Programme.

- All company directors, employees, must be familiar with and abide by the Anti Bribery and Corruption Programme.
- All company directors, officers and employees must comply with all anti-bribery laws, rules and regulations applicable in the area of operations.
- All company directors, officers must ensure that agents, sponsors, sales and marketing agents and business partners and their respective employees transacting business on behalf of the company, comply with the FCPA and the UK Bribery Act.
- The company takes a zero tolerance approach to bribery and expressly prohibits facilitation payments of any kind.

Compliance to the FCPA and UK Bribery Act are mandatory and a condition of employment within the company. Individuals who fail to comply with this policy will be subject to immediate disciplinary action.



Chris Aylward
Group Chief Executive

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