

Anti-Bribery And Corruption Policy

Statement from the Operations Director

Craven & Findlay Ltd T/A CFone Communications and referred to hereon as CFone is committed to applying the highest standards of ethics and honesty in its business activities in the UK and overseas and we operate a zero-tolerance approach to bribery and corruption. The giving and receiving of bribes, and any other form of corrupt payment involving Business Partners is absolutely unacceptable.

Mark Hodgkinson – Operations Director, Craven & Findlay Ltd

Our commitment

Craven & Findlay Ltd is committed to conducting business in an ethical manner and we expect anyone working for us or with us to operate with the utmost honesty and integrity.

This policy sets out the standards by which CFone expects its Business Partners (as defined below) to abide.

About this policy

All Business Partners must read and comply with this Policy. Failure to do so may result in termination of the business relationships and legal liability.

In this Policy, “Business Partners” shall mean any person, organisation or third party anywhere in the world:

- i. who performs or will perform services or supplies goods for or on behalf of CFONE including (but not limited to) agents, intermediaries, consultants, contractors, sub- contractors, actual or potential goods or service providers, joint venture and franchise partners or retailers;
- ii. with whom CFONE has arrangements in place in relation to the purchase and resale of CFONE products including, (but not limited to) buyers, wholesalers and contractual counterparties;
- iii. who has a business to business relationship with CFONE.

“Employees” refers to individuals employed by CFONE.

Responsibilities

The prevention, detection and reporting of bribery and other forms of corruption is the responsibility of all Employees and Business Partners.

CFONE does not tolerate behaviour that may contravene the Bribery Act 2010 or related legislation, including:

- Business Partners giving or receiving improper financial or other advantages whether directly or indirectly;
- Any conduct that could affect or appear to affect or influence an individual's conduct in the course of their professional or public duty.

Gifts and Hospitality

Gifts and hospitality can form part of normal business relationships with Business Partners, provided that it is proportionate, appropriate and has a genuine business purpose.

However, it must never affect or appear to affect impartial decision making or conduct of Partners or other parties who work for or with CFONE.

In order to avoid potential conflicts of interest CFONE discourages the giving or receiving of gifts or hospitality by Business Partners.

Free Samples

Business Partners may only offer free samples to Partners if they are offered solely for the purpose of making genuine business decisions. Business Partners must never use the offer of free samples to entice Partners or other parties working for or with CFONE, to purchase a product or enter into or renew a contract.

Facilitation Payments

“Facilitation payments” are transactions that often take the form of small cash payments to officials to “smooth the path” of a transaction, or expedite a routine.

Business Partners must never make, offer, solicit or encourage facilitation payments under any circumstances.

Tax Evasion

Tax evasion and the facilitation of tax evasion in all forms is a criminal offence. CFONE will not tolerate behaviour that facilitates Business Partners in evading their tax obligations, or conceal or turn a blind eye to tax evasion.

CFONE is committed to reporting any such activity of which it becomes aware.

Record Keeping

We expect our Business Partners to have processes in place to ensure that this Policy is complied with at all times when dealing with or acting on behalf of CFONE.

We also expect our Business Partners to have processes in place to protect employees who provide information on unfair or inappropriate business dealings.

CFONE requires that Business Partners keep financial records and have appropriate internal controls in place evidencing the business reason for giving and/or receiving payments from/to third parties.

Reporting concerns

If you are ever in doubt about a situation and are concerned about a possible breach of this Policy, or have concerns about bribery or corruption in connection with CFONE, you must let us know immediately.