



Anti-Bribery & Corruption Policy

In support of the Bribery Act 2010 - We hereby make the following anti-bribery commitment

Zero tolerance to bribery and corruption

The Managing Director will take a zero tolerance approach towards any act of bribery within the organization and by any others connected with its business. The management has made a commitment to the company's internal controls, compliance programmes and measures for preventing and detecting bribery and corruption.

Risk assessments and due diligence

We will assess the risks of bribery and corruption taking place within Ashdale's business and develop effective, efficient and transparent controls to reduce exposure to those risks. This will include following due process in our contractual arrangements and taking prompt action where we detect dishonest practice.

We will seek assurances from all third parties we do business with

We are prepared, where relevant, to ask our contractors, suppliers, agents and any other organisations that we have a contractual and/or financial arrangement with to provide evidence of their anti- bribery commitment. If we do not receive a satisfactory response, we will consider terminating that business arrangement.

We will promote the business benefits of rejecting bribery

We will take an anti-bribery approach to protect the reputation of the organisation and its employees, improve contractor confidence and provide reassurance that we are an organisation with integrity.

Training at all levels

All employees of Ashdale will be inducted into awareness of the policies and philosophy of the company. It is the duty of all individuals at all levels to remain vigilant and report suspicions of bribery and corruption or improper business practices to management.

We will demonstrate and communicate the processes we have in place to prevent bribery

We will continually review our processes to ensure we assist our staff and others to avoid any risk of involvement in bribery and corruption and ensure these are communicated effectively.

We will work with our business partners to combat bribery and corruption

We will support initiatives designed to reduce the risk of bribery and corruption. We will request that all business partners read and comply with our policy and to impose similar requirements on their own third parties.

Signed:

A handwritten signature in black ink, appearing to read 'Jocelyn Mead', is written over a light blue horizontal line.

Designation: Jocelyn Mead, Managing Director,

Date: January 2021

