

## **Anti Corruption & Anti Bribery Policy & Plan**

FP McCann has a clear anti-corruption policy. We fully support our employees to make decisions in line with our anti-corruption policy.

Our corporate conduct is based on our commitment to acting professionally; fairly and with integrity and does not tolerate any form of bribery or corruption.

This policy applies to FP McCann employees (staff, contract and temporary) and extends to all our business dealings and transactions in all countries in which we operate.

We will encourage the adoption of this policy amongst our business partners including contractors, suppliers and customers.

### **Policy**

Our Corporate Responsibility Policy sets out our commitment to operate responsibly and to engage with our stakeholders to manage the social, environmental and ethical impacts of both our activities and theirs.

FP McCann does not engage in bribery or any form of unethical inducement or payment including facilitation payments and 'kickbacks.' All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the Company.

Employees have strict guidelines regarding hospitality and gifts accepted or offered, which are subject to managerial review. FP McCann does not make direct or indirect contributions to political parties.

### **Responsibilities**

The Board of Directors is responsible for implementing this policy. If any instance of bribery or corruption is identified, the company will take remedial steps immediately.

### **Training and communications**

This policy and relevant guidance will be communicated to employees across the Company through our established internal communication channels. We will also communicate this policy to our suppliers, contractors and business partners and wider stakeholders.

### **Raising concerns and seeking guidance**

Employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage.

### **Monitoring and review**

The FP McCann Board of Directors will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate.

### **Internal controls and audit**

FP McCann has established mechanisms to maintain accurate records - available for inspection - which properly and fairly document financial transactions and agreements. Internal control systems are subject to regular audits to provide assurance that they are effective in countering corrupt practices.

**Signed:**



**Position:** Managing Director

**For:** FP McCann Ltd

**Date:** 15<sup>th</sup> November 2011

**Review Date:** 14<sup>th</sup> November 2012