



KCP ENVIRONMENTAL SERVICES LTD **Anti-Bribery & Corruption(AB&C) Policy Statement**

All KCP employees & directors are committed to the highest level of ethical behaviour and have zero tolerance for bribery and corruption. KCP requires compliance with all anti-bribery and corruption laws and remains bound by the laws of the UK, including the Bribery Act 2010, in respect of its conduct both at home and abroad. KCP does not tolerate the giving or receiving of bribes, including the making of facilitation payments. KCP emphasises that books and records must be fair and accurate and reasonably detailed. We expect all employees, Associated Persons and other third parties with whom KCP works, to comply with these principles in the performance of their services for or on behalf of KCP.

KCP's AB&C Programme includes the following global standards:

- No KCP entity or individual shall engage in bribery or corrupt practices in any form, whether direct or indirect;
- No KCP entity or individual shall engage in bribery with a public official or private party. This includes any advantage provided to a close family member or other closely connected person of the public official or private party; and
- No KCP entity or individual shall engage in the provision of a facilitation payment. Facilitation payments are typically small, unofficial sums made to secure or expedite a routine government action by a government official. Exceptions may be permitted in extraordinary circumstances to protect against loss of life, limb or liberty.

The AB&C Programme also imposes the following requirements on activities:

- **Gifts, Entertainment and other Advantages:** No KCP entity or individual shall offer or permit any gift, entertainment or other advantage to be offered without the appropriate controls being applied;
- **Recruitment:** All recruitment must be merit-based, fair, and in keeping with the stringent hiring standards applied for all employees. Hiring, for paid or unpaid, temporary or permanent roles, must not be used to influence business;
- **Charitable Giving:** No KCP entity or individual shall offer or permit any charitable giving to be used as a subterfuge for bribery; and
- **Political Contributions:** No KCP entity or individual can use KCP funds, property or facilities to provide support for, nor contribute to, any political organisation or political candidate as KCP is politically neutral.

KCP also maintains clear whistleblowing policies and processes to ensure that individuals can confidentially report concerns and to ensure that such concerns are investigated and remediated appropriately

Wendy Pring, Managing Director – January 2018