



Anti-Bribery & Corruption Policy

Introduction

SIG plc has a number of fundamental principles and values which it believes are the foundation of sound and fair business practice and as such are important to uphold. One such principle is a **zero tolerance position in relation to bribery and corruption**, wherever and in whatever form that it may be encountered. Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal or a breach of trust. Corruption is the mis-use of power for gain. This document is intended to build on our Ethics Policy and to clearly state the standards required to ensure conformance to our principles, as well as the legal requirements within the countries in which SIG and its subsidiary companies operate.

SIG plc values its reputation for ethical behaviour, financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery and corruption by:

- Setting out a clear anti-bribery & corruption policy;
- Training all employees so that they can recognise and avoid the use of bribery by themselves and others;
- Encouraging its employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery or corruption.

What is Bribery?

A bribe does not need to be actual money. It can be any form of advantage offered, requested or received. A contract does not need to have been won for a corruption offence to have been committed. Similarly, a recipient does not need to benefit personally from a bribe – it may be that the intended beneficiary is a third party or a company. Finally, bribery can occur in the private as well as the public sector – it is not just about our relationship with public officials.

Policy

SIG's policy consists of two straightforward rules that all employees and all consultants and agents must strictly adhere to:

- Do not offer, promise or pay bribes
- Do not request, agree to or accept bribes

This policy applies globally to individual employees, customers, suppliers, agents, distributors, consultants or any other people or bodies associated with SIG or any of its subsidiaries and employees.

Gifts and Hospitality

Gifts and hospitality can also amount to bribery. Local custom and practice is not a valid defence. The test to be applied in all circumstances is whether the gift or entertainment is reasonable and proportionate. What is the intention of the gift? Special care must be taken in accepting or giving gifts or entertainment and these are not permitted if they would create a real or perceived conflict of interest. Each business will have its own appropriate guidelines and authority procedures in place in relation to gifts and hospitality to ensure transparency and proportionality. The SIG Ethics Policy details this further under the heading "Gifts and Entertainment".



Anti-Bribery & Corruption Policy

This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the SIG Group or of the person or body employing them or whom they represent.

This policy is not meant to prohibit the following practices providing they are proportionate and are properly recorded:

- The giving or receiving of reasonable and appropriate hospitality
- The giving of a ceremonial gift of nominal value on a festival or at another special time

Facilitation Payments

This policy also prohibits 'facilitation payments' which are small unofficial payments for routine governmental action, such as speeding up the unloading of cargo, issuing permits and other actions of an official in order to expedite performance of duties which they are already bound to perform. This should be contrasted with recognised 'fast track' processes available to all on payment of an official fee.

If you are unsure as to the validity of an official's request for a payment, the steps below should be followed as far as they are applicable and as far as it is possible for you to do so without putting your personal safety or security at risk:

- If possible contact your line manager or supervisor immediately
- Ask the official for proof of the validity of the fee
- Request that a receipt is provided confirming the validity of the payment
- If no proof of validity will be provided, politely decline to make the payment and explain you cannot do so because of company policy and anti-bribery laws
- If possible ask to see the official's supervisor
- Make a full note of the request, the circumstances and the parties involved
- At all times remain calm, respectful and polite

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to their immediate manager, supervisor or the Company Secretary before proceeding.

Report Concerns - Employee Responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the Group. Suitable channels of communication, including the confidential hotline, by which employees or others can report confidentially any suspicion of bribery, will be maintained; details of this can be found in the SIG Whistleblowing Policy.

Employees who are suspected of involvement in bribery or corruption will be subject to disciplinary procedure.

The Group Chief Executive has lead responsibility for policy implementation within the SIG Group and this policy is signed by the CEO to demonstrate the Board's commitment.

Stuart Mitchell

Group Chief Executive

Issue no: 4

Issue Date: March 2013

Doc Ref: SIG-ABP