

# Bribery & Corruption Policy

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Bribery and corruption is, unfortunately, a feature of corporate and public life in many countries across the world. Governments, businesses and nongovernmental organisations such as ours are working together to tackle the issue but despite our collective efforts eradicating all forms of bribery and corruption will take time. Starfish 9 therefore has a clear policy on this subject, and as such we shall continue to support our employees in decision making processes that support our stated position, the overall intention of which being to ensure that at all times we act professionally, fairly and with integrity. Starfish 9 does not tolerate any form of bribery and corruption.

This policy applies to all employees (staff, contract and temporary) employed directly and in-directly by Starfish 9 Limited, involving any business dealings and transactions we may be involved with throughout the UK. Where we have a minority interest we will encourage the application of this policy amongst our business partners including contractors, suppliers and joint venture partners. This policy should also be considered and implemented in conjunction with the ethical guidance offered by senior management when giving and accepting gifts and hospitality.

Our Business Principles set out our commitment to operate responsibly wherever we work and to engage with our stakeholders to manage the social, environmental and ethical impact of our activities in the different markets in which we operate. Our first principle, 'integrity is in corporate conduct', where we advocate that we shall 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 within the business operations of our Company. Employees must declare and keep a record of hospitality or gifts accepted or offered, which will be subject to managerial review. We do not make direct or indirect contributions to political parties.

We will uphold laws relevant to countering bribery and corruption in all the jurisdictions in which we operate, particularly laws that are directly relevant to specific business practices.

**Name:** John Jessimer

**Signed:** 

**Position:** Managing Director

**Date:** 7 January 2021

