



AJ LUCAS GROUP LIMITED

ANTI-BRIBERY & CORRUPTION POLICY

September 2014

1. BRIBERY AND CORRUPTION

AJ Lucas Group Limited (Lucas) is committed to conducting all of its business in an honest and ethical manner. It operates a zero-tolerance approach to all forms of bribery and corruption, whether direct or indirect. The company maintains anti-bribery and whistleblowing policies which set out the responsibilities of Lucas and those working for it with regard to observing and complying with its position on bribery and corruption. It requires its directors, employees, contractors, consultants, suppliers and business partners to act ethically and fairly, and to comply with Lucas policies and applicable anti-bribery and corruption laws wherever it operates worldwide.

Lucas does not offer, promise, give, demand or accept any undue advantage, whether directly or indirectly, to or from:

- a public official;
- a political candidate, party or party official;
- a community leader or other person in a position of public trust; or
- any private sector employee (including a person who directs or works for a private sector enterprise in any capacity)

in order to obtain, retain or direct business or to secure any other improper advantage in the conduct of business.

Certain countries allow what is known as “facilitation payments” as an exception that is permitted under the local law; however, Lucas prohibits the making or acceptance of facilitation payments or kickbacks of any kind.

Further, no payments will be made to trade unions or their officials, nor any donations made to political parties or charitable donations, for the purpose of gaining commercial advantage.

If you are in doubt about the legitimacy of a payment that you have been requested to make, seek the advice of the Lucas Executive Leadership.

2. GIFTS AND HOSPITALITY

Lucas appreciates that the giving or receipt of modest gifts or hospitality in a business context can be acceptable. However, any gifts or hospitality given or received as a reward or encouragement for preferential treatment are not allowed.

The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. If it could in anyway be intended, or reasonably interpreted, as a reward or encouragement for a favour or preferential treatment, it is prohibited by Lucas. The intention behind the gift should always be considered.

All gifts, irrespective of value and hospitality other than business meals, must be reported to and approved by the Managing Director. A register is to be maintained of all qualifying gifts and hospitality, whether given or received.