

## **Anti-Corruption Policy Statement**

SIS operates according to certain fundamental principles and values which it believes are essential to sound and ethical business practice. One such principle is zero tolerance in relation to corruption, wherever and in whatever form.

To this end, SIS is adopting an Anti-Corruption Policy which sets out the responsibilities of departments and business units in observing and upholding our position on bribery and corruption.

### **Policy**

It is SIS's policy to comply with all anti-bribery and corruption laws, rules and regulations in all countries in which SIS operates.

Under the Bribery Act 2010, bribery and corruption will be punishable for individuals by up to ten years' imprisonment. For companies, the penalties will be unlimited fines and being blacklisted from tendering for government contracts in the EU (and possibly elsewhere). A further (and unquantifiable) consequence is damage to reputation. For these reasons, SIS takes its legal obligations in this area very seriously.

Bribery is committed when an inducement or reward is provided in order to gain any commercial, contractual, regulatory or personal advantage for SIS or another party.

This policy does not prohibit normal and appropriate hospitality (given or received) or gifts provided that they are customary in a particular market and are proportionate and properly recorded.

### **Expectations**

The prevention, detection and reporting of bribery and corruption is the responsibility of all staff throughout SIS.

All workers (which includes permanent and temporary employees, agency staff and contractors) within the SIS Group in all countries in which we or our subsidiaries operate are expected to be familiar with and comply with this Policy. Selected managers and employees will receive relevant training on how to implement the Policy within the scope of their roles at SIS. The Managing Director of each division is also responsible for establishing appropriate responsibilities and procedures within their business unit and operations to provide assurance that they are effective in countering bribery and corruption.

We will also communicate this policy to our suppliers, contractors and business partners.

### **Further Guidance**

Inevitably, decisions as to what is acceptable may not always be easy, particularly in the absence of minimum legal standards. If anyone is in doubt as to whether a potential act constitutes bribery or corruption, the matter should be referred to their immediate line manager or to the Compliance Officer.

The Chief Executive has lead responsibility for policy implementation within the SIS Group and this policy is signed and issued by me to demonstrate the board's commitment.

Richard Ames

A handwritten signature in black ink, appearing to be 'R. Ames', followed by a period.

Chief Executive

Dated: 1<sup>st</sup> February 2018