

GYM MARINE LIMITED ANTI-BRIBERY POLICY

Introduction

We are committed to carrying out business fairly, honestly and openly. This means we have a zero tolerance towards bribery. We will never permit or authorise the offering, making or receiving of a bribe.

There are no exceptions to this policy.

This document sets out our general policy in relation to bribery. All employees and contractors need to be aware of the policy as will impact on your relationship with us.

Our commitment starts at the top

The directors are personally committed to this policy. The chief executive is always available to discuss your concerns about our policy. The directors will regularly review this policy and its operation.

Who does this policy apply to?

This policy applies to everyone who works for us at whatever level. It will include all directors, employees, as well as anyone who is not an employee such as consultants, sub-contractors, agents, representatives, (who we will refer to as contractors).

Consequences of breaches of the policy for our employees and directors

Bribery is a crime under the Bribery Act 2010 wherever it takes place. If you offer, make or receive a bribe you will be breaking the law. We can also be liable for your activities.

Any employee of ours who offers, makes or receive a bribe is very likely to be subject to disciplinary procedures. Bribery is likely to amount to gross misconduct and lead to dismissal.

Consequences for us if bribery takes place

If we or a contractor acting for us are involved in bribery:

- we will suffer damage to our reputation (including being subject to unfavourable press, TV and social media scrutiny);
- those who do business with us may cancel or not renew contracts with us;
- those who buy our goods and services may no longer do so;
- if we are convicted of bribery we may have to pay over whatever amounts we have received from any business or contracts entered into pursuant to a bribe;
- We could be sentenced to 10 years in jail and an unlimited fine.

Consequences for those who provide goods and services to us

If a contractor has used bribery we will normally wish to stop trading with them and terminate our contracts with them.

Recognising what is and what is not a bribe

- It is not always easy to distinguish a bribe from a legitimate payment we need make or which we receive. In our business we regularly engage in hospitality, **give** small gifts, and make charitable donations.
- Hospitality, gifts and charitable donations are not normally illegal and are all perfectly acceptable. They are also a normal way of establishing and building contacts and relationships with potential and actual customers as well as our suppliers.
- To help you understand what is acceptable for you to receive or make in the way of gifts and hospitality, please consult the Chief Executive. Any charitable gift whether made by a third party or to be made by us needs the approval of the Chief Executive.
- Requests to make or receive payments other than those in the normal course of our business must always be treated with suspicion. Usually it will not be difficult to tell when something does not seem right.

What you should do if you are subject to an offer of or making of a bribe or a request for a bribe?

If you are asked to make a bribe or you are offered a bribe you must of course refuse to make or receive the bribe. You should report the matter immediately to the Chief Executive.

We recognise that in certain circumstances you may feel that your personal safety is at risk if you are asked to make or receive a bribe. In such circumstances you will need to do what is necessary to protect yourself and report what has occurred as soon as possible.

Raising concerns

We wish to encourage you to raise any concerns or suspicions you may have as soon as you have them. Even if you are not sure whether what has occurred amounts to bribery raise your concerns with the Chief Executive. If you do so and have done nothing wrong, you will not be subject to any disciplinary action or unfavourable treatment.

How we communicate this policy

This policy is made available in the following ways:

- It is available on our website;
- A copy of this policy is provided to every new employee or contractor.