

Anti-Bribery Policy

The Bribery Act 2010

The Bribery Act 2010 creates offences of offering or receiving bribes, bribery of foreign public officials and of failure to prevent a bribe being paid on an organisation's behalf. The legislation affirms and supports CJ Associated Limited's ("the Company") zero tolerance position on fraud, corruption, malpractice and bribery. Companies and individuals who break this law face an unlimited fine and/or imprisonment for up to 10 years.

Who this policy applies to

This Policy applies to all of the Company's directors and employees whether permanent or temporary. It also applies to the Company's advisers, consultants, joint venture partners and sub-contractors (together "Associated Persons").

Bribery Prevention Policy

The directors of the Company are committed to preventing bribery within the company and by persons associated with it, and are responsible for assessing bribery risk and determining the Company's bribery prevention procedures.

The Company mitigates the risk of bribery occurring by requiring that all payments are authorised by CR Johnson Director or C.Ovens Managing Director of CJ Associates.

The Company's employees and Associated Persons must ensure that they are familiar with the content of this Policy and adhere to it at all times.

Procedures to Prevent Bribery

1. Risk Assessment

- The Company's Executive Group will assess the bribery risk in any proposal which the Company makes.
- The Company's directors will assess the bribery risk and undertake appropriate due diligence on Associated Persons.
- The Project Manager will assess the bribery risk and outline mitigating procedures within the project plan.

2. Associated Persons

The Company will only contract with Associated Persons and engage with business partners who demonstrate at all times business integrity and who practice ethical conduct which meets the standards set out in this Policy and all applicable laws and regulations.

3. Gifts, Hospitality and Promotional Expenditure

The Company shall only provide bona fide hospitality, promotional or other business expenditure i.e. that which is reasonable and proportionate.

All gifts, hospitality and promotional expenditure either provided by the Company or to individuals within the Company must be recorded on the Hospitality Register.

4. Charitable Contributions and Sponsorship

The Company and its employees may only make charitable contributions or sponsorships on behalf of or in the name of the Company for bona fide charitable purposes and where activities accord with the Company's business objectives, values and ethical principles.

All requests for charitable contributions and sponsorship must first be sent to CR Johnson or C Ovens for approval and shall be recorded in an appropriate register.

5. Political Contributions

The Company's funds and resources are not to be used to contribute to any political campaign, political party, political candidate or any of their affiliated organisations with the intention of obtaining business or any other advantage in the conduct of business. The Company will not use charitable donations as a substitute for political payments.

6. Facilitation Payments

The Company prohibits making or paying facilitation payments, which are payments to induce officials to perform routine functions they are otherwise obligated to perform, to any third party by its directors, employees and Associated Persons.

Any request by a third party for a facilitation payment must be reported to C Ovens.

7. Breach of this Policy

The Company considers a breach of this Policy as a serious offence. Any violation will result in disciplinary action, up to and including dismissal of an individual. The business relationship with Associated Persons who violate this Policy may also be terminated.

8. Reporting of Bribery

If you have any concerns that anyone within the Company or any Associated Person is offering or promising or paying bribes to anyone or requesting, agreeing to accept or receiving bribes, please raise them with your Project Manager, C Johnson or C Ovens.

9. Communication of the Policy and Procedures

The Company's commitment to bribery prevention is communicated to all new employees and associated persons on appointment and to existing employees periodically at company meetings.

10. Monitoring

Compliance with this Policy by the Company's directors, employees and all Associated Persons will be reviewed periodically.



Colin Ovens, Managing Director

Issued: 7th January 2015
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