



Business Management System Tier 0

PD107 ERG PT Anti-Bribery and Corruption Policy

Anti-Bribery and Corruption Policy

Overall Anti-Bribery and Corruption Policy

ERG Process Technologies Ltd (ERG PT), consisting of ERG (Air Pollution Control) Ltd, ERG APC Maintenance Ltd and ERG (Plastic Fabrication) Ltd, will conduct its business with integrity. It will operate in accordance with all applicable laws and regulations in the countries within which it is active. ERG PT will not make or tolerate improper or illegal payments or bribes or engage in corrupt practices. It will assist in ensuring that its partners, suppliers and contractors adhere to these principles.

Supplemental Policy Statements

- Any employee found to have engaged in giving or receiving illegal payments, in bribery and/or other corrupt practices will be considered as guilty of gross misconduct and so handled under the Company's disciplinary procedures, potentially leading to termination of employment without notice. ERG PT may disclose details of the corrupt practice to the relevant authorities, if deemed appropriate.
- If an agent, representative, contractor, business partner or anyone else performing services on behalf of ERG PT (together "Agents") is found to have engaged in bribery or other corrupt practices in connection with our business, ERG PT will look to terminate any contractual relationship with such individual or company and/or pursue such other remedies as may exist under the applicable legal regime and contractual framework, including notifying the relevant authorities where it considers appropriate. ERG PT will seek appropriate contractual safeguards from its employees and Agents in this regard.
- If an employee or Agent suspects or becomes aware of a corrupt act or of an intention to undertake a corrupt act in relation to the ERG PT's activities and interests, this should be advised to the ERG PT Managing Director. Any such disclosure will be treated in confidence as a 'protected disclosure' and will be fully investigated. No censure will be attached to the individual making the disclosure and no individual should be fearful of making such a disclosure.
- ERG PT will not make facilitation payments. Facilitation payments are typically low value payments made to officials to facilitate a routine process. Exceptionally if an individual feels it necessary to make such a payment because their life is threatened, any such payment should be reported to the ERG PT Managing Director as soon as possible after the payment is made.
- ERG PT commits to ensure that any gift or hospitality provided by the company is transparent, proportionate, reasonable and bona fide. Such gift or hospitality must not be designed to give the recipient the impression of an obligation or pressure to confer any business advantage on ERG PT in return. Provision of gifts or hospitality for public officials must always be for a legitimate business purposes, must be approved by management within ERG PT and may in some circumstances also require approval of the relevant public body;
- Payments to, purchases made on behalf of, public officials must be permitted by the "applicable written local law", which means according to a written constitution, provision made under applicable local legislation or according to judicial decision. Such payments and their justification will need approval of the ERG PT Managing Director and must be made, received and documented in a transparent fashion

Signed:

Date: 16 / 1 / 2020

James Scott-Bowden
ERG PT Managing Director