

CitySync Ltd & CA Traffic Ltd Policy on Anti-Bribery and Corruption

CitySync Ltd appreciates the importance of ethical behaviour and we are proud of our high ethical standards.

The UK Bribery Act 2010 creates offences and penalties for bribery and corruption. The UK Bribery Act 2010 creates a corporate offence of failure to prevent bribery, and requires a company to implement 'adequate procedures' to prevent bribery.

This policy sets out the responsibilities of CitySync Ltd in preventing bribery and corruption and how we will implement 'adequate procedures' to do so.

Failure of a corporate to prevent bribery by someone acting on its behalf.

For the purposes of this policy, bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favour, or a financial or other advantage from another to influence a business outcome improperly, or to induce or reward improper conduct.

Gifts can be defined as presents such as flowers, vouchers, food and drink. Event and travel tickets given to you as an individual are also gifts when they are not to be used in a hosted business context.

Hospitality includes invitations to hosted meals, receptions and events for business purposes.

Refer to the Director if you are in any doubt whether to accept any gifts or hospitality from clients, contractors, suppliers, other third parties or public officials.

Bribery and corruption – whether involving government officials, or commercial entities, including joint ventures – can be direct or indirect through third parties such as agents, brokers and joint venture partners. It includes facilitation payments even though in some countries facilitation payments are legal.

All persons covered by this Policy have a role to play in preventing, detecting and reporting any incident of bribery or corruption. You must:

- Immediately report any suspicions to the General Manager or another Senior Manager
- You should not:
- Confront the suspect, or
- Discuss the suspicion more widely, or
- Begin any investigation that may result in loss of evidence

Employees have a statutory duty to report suspicion of bribery or corruption immediately to the General Manager.

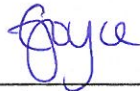
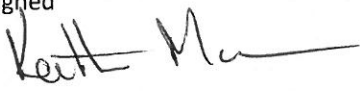
Following the Reporting of Suspected Bribery or Corruption

Every reported incident of bribery or corruption will be investigated. The confidence of those reporting the incident or suspicion of bribery or corruption will be respected. The investigation will be carried out either internally by a Manager appointed by the General Manager or an alternative senior member of staff.

Following investigation, every suspected incident of bribery or corruption involving a member of staff will be reported to the General Manager. In all cases the General Manager will take the decision as to whether the police or other authorities will be brought into the investigation.

Consequences of Committing Bribery or Corruption

Any employee or director who has committed a fraud should expect suitable disciplinary procedures, which may include immediate dismissal. Individuals will normally be prosecuted and CitySync Ltd will seek to recover any losses. The penalties under the Act are severe – there is a maximum penalty of 10 years imprisonment and / or an unlimited fine for individuals.

Managed by:	QH&S Representative	Signed 	Date 11/5/18
Approved by	Operations Director CitySync Ltd & CA Traffic Ltd	Signed 	Date 11/5/18

This policy is reviewed annually