

## **Albany Total Waste Limited Anti-Bribery Policy (Covering the giving and acceptance of bribes)**

### **Introduction.**

Albany values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy.
- Training all employees so that they can recognise and avoid the use of bribery by themselves and others.
- Encouraging its employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately.
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution.
- Taking firm and vigorous action against any individual(s) involved in bribery.

### **The Policy**

*The Group prohibits:*

The offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement.

*To or from:*

Any person or company, wherever they are situated and whether they are a public official or body or private person or company.

*By:*

Any individual employee, agent or other person or body acting on Albany's behalf.

*In order to:*

Gain any commercial, contractual or regulatory advantage for Albany in a way which is unethical.

*Or in order to:*

Gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

### **Further Clarification**

Albany Total Waste Limited recognises that market practice varies across territories in which it does business and what is normal and acceptable in one place may not be in another. This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of Albany or of the person or body employing them or whom they represent.