

LMN

Anti Bribery and Corruption Policy

1. Policy Statement

- 1.1 LMN is committed to applying the highest standards of ethical conduct and integrity to its business activities. Every employee and individual acting on LMN`s behalf is responsible for maintaining our reputation and for acting with integrity and conducting business honestly and professionally.
- 1.2 We maintain a zero-tolerance approach to bribery and corruption and are committed to acting with integrity, fairness and with professionalism in all matters wherever we operate.
- 1.3 LMN`s Directors are committed to implementing and enforcing effective systems throughout the company.
- 1.4 The purpose of this policy statement is to;
 - A) Set out our responsibilities and those working for us (which for the purposes of the Bribery Act includes service providers for LMN), in observing and upholding our position on bribery and corruption.
 - B) Provide information and guidance as to how we expect those working for us to conduct themselves and how to recognise and deal with bribery and corruption issues: and
 - C) How to raise concerns with us including any breaches of this policy statement.

2. Definition of Bribery

A bribe is an inducement or reward offered, requested, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. This can be in the context of giving or receiving. An offence is committed when the bribe is coupled with an intention of inducing a reward for, or in anticipation of, a person to improperly perform their function, or if the request, agreement to accept, or acceptance of the bribe itself constitutes, or is believed to have constituted, the improper performance of

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an activity. For clarity this applies to the offering of a bribe to public officials or members of any organisation.

3. Responsibilities

The prevention, detecting and reporting of bribery and other forms of corruption is the responsibility of all those working for, providing services and acting as agents for, or under the control of LMN.

4. Gifts and Hospitality

4.1 LMN permits normal and appropriate corporate entertaining, gifts, hospitality and promotional expenditure (given and received) to or from third parties that is undertaken;

- A) For the purpose of establishing good business relationships
- B) To improve the image and reputation of LMN
- C) To present LMN's goods/services effectively.

Provided always that the above are carried out in good faith and not offered, promised or accepted to secure an advantage for the Company, its employees or associated persons, or to influence the impartiality of the recipient.

4.2 The giving of gifts by LMN employees with a value of £50 or higher is prohibited without the written approval of a Director. Similarly, any gift having a value of £50 or more, and offered to an employee must be declined. Any gifts in the form of cash must never be accepted, nor offered, by LMN employees. Any such incident must be immediately reported to a Director.

4.3 The giving or receiving of corporate hospitality should never exceed a value of £50 per head unless approval, either prior or retrospective, is received from a Director.

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5. Record Keeping

LMN, including all employees and agents acting for and on behalf of LMN, are required to keep financial records and have appropriate internal controls in place which will evidence the business reason for giving and/or receiving payments to/from third parties.

6. Raising Concerns

If you believe, or suspect, that this policy has been breached in any way please contact the Directors immediately.