



Swift Crafted Ltd Bribery and Corruption Policy

1. Introduction

This document is intended to clearly state Swift Crafted Ltd's position with regard to bribery and corruption. Swift Crafted Ltd does not engage in or tolerate any form of bribery and corruption. Our corporate conduct is based on our commitment to acting professionally, fairly and with integrity.

2. Scope

This policy applies to Swift Crafted Ltd and every employee (staff, contract and temporary). Where we have a minority interest we will encourage the application of this policy amongst our business partners including contractors, suppliers and joint venture partners. The purpose of this policy is to set out Swift Crafted Ltd's position on bribery and corruption and provide guidance to employees on the prevention, detection and reporting of bribery and corruption.

3. Policy

Swift Crafted Ltd is committed to operate responsibly regarding the social, environmental and ethical impact of our activities. Swift Crafted Ltd does not engage in bribery or any form of unethical inducement or payment including facilitation payments and 'kickbacks.' All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the Company. We do not make direct or indirect contributions to political parties. We will uphold laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. The company abides by The Bribery Act 2010.

This policy does not prohibit the following practices providing they are customary in a particular market, or are proportionate and are properly recorded:

- Normal and appropriate hospitality (given or received)
- The giving of a ceremonial gift on a festival or at another special time

Special care must be taken in accepting or giving gifts/entertainment and these are not permitted if it would create a real or perceived conflict of interest. A register of accepting or giving of gifts/entertainment will be kept and monitored on a regular basis via an internal audit schedule. We will communicate this policy and relevant guidance to all staff, through our established internal communication channels. We will also communicate this policy to all interested parties.

4. Monitoring and review

Swift Crafted Management will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate.

5. Responsibilities

The Swift Crafted Ltd Management Team is primarily in charge of implementing this policy and for reporting annually to the Management Board. The Managing Director is ultimately responsible for this policy.

Simon Hearle

Managing Director 15th May 2017