

2<sup>nd</sup> June, 2017**Anti-Bribery / Anti-Corruption Policy****1. Overarching Policy.**

It is the policy of the Harwin group of companies to conduct all business activities in compliance with the rules and regulations applicable to our industry and the laws in the countries in which the company operates. In all cases, these business activities are conducted to the highest ethical standards. Harwin's reputation is built on the integrity of our employees and their commitment to maintaining the highest standard of business practice.

**2. Bribery.**

Commercial bribery is a criminal offence in many countries in which Harwin operates. Even in those countries where this is not the case, the Harwin policy still applies.

- a. Harwin strictly prohibits the making of, or offering to make, any payment, gift, inducement or incentive to any employee, or to a family member of an employee, of customers or potential customers of Harwin that may lead to that employee to breach his or her duty to their employer.
- b. Harwin strictly prohibits the making, or offering to make, any payment, gift, inducement or incentive to any employee, or to a family member of an employee, of suppliers or potential suppliers to Harwin, that may lead to that employee to breach his or her duty to their employer.
- c. Employees of Harwin, or family members of an employee, are strictly prohibited from accepting any payment, gift, inducement or incentive from customers or potential customers of Harwin, that may lead to that employee to breach his or her duty to Harwin.
- d. Employees of Harwin, or family members of an employee, are strictly prohibited from accepting any payment, gift, inducement or incentive from suppliers or potential suppliers to Harwin, that may lead to that employee to breach his or her duty to Harwin.
- e. The provision of hospitality and entertainment by Harwin employees to customers or potential customers is deemed not to be in breach of the above prohibitions provided that the hospitality and entertainment is reasonable and commensurate to that which is expected in that country/region. Likewise, Harwin employees may accept hospitality and entertainment provided that it is reasonable and commensurate to that which is expected in that country/region. Hospitality and entertainment includes meals, drinks, travel and accommodation. In the event that the cost of the hospitality and entertainment exceeds £50 / \$65 (US), then the expense is to be recorded in the company accounts.

### 3. Promotional Gifts.

Harwin employees may make small promotional gifts to customers and potential customers in certain circumstances. These include the promotion of the Harwin brand name or to promote a new Harwin product introduction. These business promotional gifts must not exceed a nominal value of £50 / \$65 (US), and are to be marked with the Harwin name and/or Harwin logo as space allows.

In some circumstances the value of the promotional gift may exceed this amount, the provision of a component development kit, for example. In the event that such a gift exceeds the nominal £50 / \$65 (US), it is to be documented in the company accounts stating the recipient's name, company, position in the company, a description of the gift and the reason for making the gift.

### 4. Gifts or Benefits to Government Officials.

Material gifts or payments to government officials are prohibited. In those countries where an exchange of gifts is customary on certain occasions, a check on local regulations and laws is to be undertaken to ensure that such a gift would not be considered to be a bribe. Likewise, prior to any hospitality and entertainment being provided, the local regulations and laws are to be checked.

Travel expenses and accommodation for government officials for visiting Harwin facilities must be approved in advance. Payments are to be made to the travel provider and hotel direct. If this is not possible then reimbursed payments can only be made on production of appropriate receipts or documentation. Air travel must be economy or business class (unless local rules dictate otherwise) and no stopover to be allowed unless paid for by the government official. Payment of travel expenses for a spouse, partner or family member of a government official is prohibited. Payment for local excursions for a government official, a spouse, partner or family member is prohibited.

The conferring of a personal benefit to a government official by way of a contribution to one or more charities is prohibited.

### 5. Political Contributions.

Harwin employees are prohibited from using Harwin funds, facilities or resource to contribute to any political party or candidate unless such contribution is allowed by local regulations and laws. Payments to lobbying organisations or third parties are prohibited if the intent is to circumvent restrictions.

### 6. Agents and Representatives.

The Harwin anti-bribery/anti-corruption policy applies to any agent or representative of Harwin. Whilst acting on behalf of Harwin, the agents or representatives are not permitted to infringe any of the prohibitions stated in the Harwin policy.

## 7. Money Laundering.

The activity of hiding, or attempting to hide, the proceeds of crime is known as money laundering. Harwin prohibits entering into any arrangement with individuals or organisations which would assist in money laundering. Should any suspicion of money laundering activity arise, it will be reported to the relevant governmental department for investigation.

## 8. Policy Implementation.

The senior managers of Harwin have the responsibility to act as role models in the implementation of this policy. In this capacity they are to ensure that employees are aware of the policy and the ramifications of infringements. Senior managers are to address any employee questions or concerns arising from the policy. Those employees raising concerns on legal and ethical issues are to be protected from any retaliatory actions provided the concern is raised in good faith. Any person conducting retaliation against an employee raising such a concern would be subject to disciplinary action. Any person infringing this policy may be subject to disciplinary actions as well as legal proceedings with severe consequential penalties.