

GRATUITIES & BRIBERY POLICY

Lilleker Bros. Ltd values its reputation for ethical behaviour and recognises that any involvement in bribery will reflect adversely on its image and reputation. Its aim is, therefore, to limit its exposure to bribery by setting out a clear anti-bribery policy.

In compliance with the Bribery Act 2010 no employee should directly or indirectly offer, promise, give or demand a bribe or other undue advantage to obtain or retain business or gain other improper advantages. All offers of bribes from third parties must be reported to the Company.

Under UK Law (The Bribery Act 2010), the penalties for committing a crime are a maximum of 10 years' imprisonment, along with an unlimited fine, and the potential for the confiscation of property under the Proceeds of Crime Act 2002, as well as the disqualification of directors under the Company Directors Disqualification Act 1986


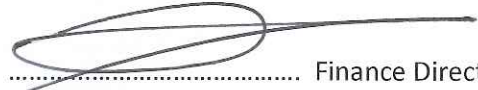
Lilleker Bros. Ltd prohibits the acceptance of gifts or services from customers, suppliers, distributors, or any person having similar connections to the Company without prior consent from management. A breach of this rule may give rise to disciplinary proceedings.

The solicitation or the acceptance of any bribe, whether cash or inducement, to any individual or company, wherever they are situated and whether they are a private person, a company or public body, in order to gain any commercial, contractual or regulatory advantage for the Company in a way which is unethical.

This policy applies to individual employees of the Company regardless of seniority.

This policy does not prohibit normal activities which are customary, appropriate and properly recorded and would include normal hospitality, providing ceremonial gifts or promotional items at festivals or other special times, meals, invitations to events, functions or other social gatherings in connection with matters related to our business. These activities are acceptable provided they fall within reasonable bounds of value and occurrence.

If in doubt that a potential act would not conform please refer to a Director of the Company.

 Managing Director  Finance Director
Date 20/03/19 Date 20/03/19