

Surface Finishing Equipment Group

Including:-

**Abraclean Ltd and
Hogg Blasting & Finishing
Equipment Ltd**



Surface Finishing
Equipment Group

Anti Bribery and Corruption Policy 2019

The Surface Finishing Equipment Group conducts business in a legal and ethical manner.

Employees are responsible for acting honestly and with integrity by ensuring that their activities, interests and behaviours do not conflict with these obligations.

This policy, based on the anti-bribery legislation (the Bribery Act 2010), requires that employees must not :-

- a) Offer, give, solicit or accept any bribe, either in cash or any other form of inducement, to or from any person or company, wherever they are located and whether they are a public official or body, or private person or company.
- b) Gain or retain any commercial, contractual or regulatory advantage through unethical or illegal means when conducting business on behalf of SFEG.

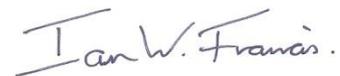
Staff and associated persons of The Surface Finishing Equipment understand and strictly comply with the UK anti-bribery laws in all countries of the world.

SFEG have a zero tolerance approach to bribery and corruption. All forms of bribery and corruption are prohibited. SFEG will address risks of bribery by ensuring adequate and proportionate measures are developed and implemented to mitigate them.

DEFINITIONS

Bribery is the offer, promise, giving, demanding or accepting of an advantage as an inducement for an action which is illegal, unethical, a breach of trust or the improper performance of a contract. Inducement can take the form of gifts, hospitality, fees, rewards, jobs, internships, examination grades, favours or other advantages. It does not matter whether the bribe is given or received directly or through a third party or whether it is for the benefit of the recipient or some other person.

Corruption is the misuse of entrusted power for personal gain.



**Managing Director
January 2019**