

ANTI-BRIBERY POLICY

Gas Sensing Solutions Ltd is committed to ethical business, financial probity and reliability, and has a zero-tolerance policy in respect of improper or criminal behaviours and will never authorise or condone the direct or indirect offering, payment gift or receipt of any improper financial or other advantage (“Bribery”) in respect of company business. The consequences of company or staff involvement in “Bribery” are not limited to breaches of law. Any involvement in bribery will adversely affect our image and reputation with our clients and in the marketplace. All employees and anyone performing services for or on our behalf must comply with this policy. Failure to comply could lead to disciplinary action up to and including termination of employment.

BACKGROUND

The Bribery Act 2010 (the “Act”) exposes the Company, directors, managers and employees to liability that could result in criminal convictions, including custodial sentences in the most severe instances.

Gas Sensing Solutions Ltd will avoid working with organisations who do not commit to doing business without bribery.

This Policy applies to managers, directors and employees (whether permanent, fixed- term or temporary), consultants, sub-contractors and agency staff, (collectively referred to as workers in this policy) as well as organisations or other third parties who act for or on behalf of/with which the Company conducts business.

In this policy, third party means any individual or organisation you may come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, business contacts, agents, advisers and government and public bodies.

WHAT IS A BRIBE?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory, monetary, financial or other personal advantage. A kickback is a payment made in return for the award of a contract. Kickbacks are commonly funded by the recipient agreeing to an inflated contract price to take account of the improper payment to be made to the decision maker.

POLICY STATEMENT

Gas Sensing Solutions Ltd prohibits the direct or indirect offering, giving, solicitation or acceptance of any bribe, whether cash or other inducement or advantage; to or from any individual working at Gas Sensing Solutions Ltd or any organisation or third party acting on our behalf in order to gain any commercial, contractual, regulatory or other advantage in a way which is unethical or in order to gain any personal advantage. For the avoidance of doubt, this policy also prohibits bribery by way of any financial or other advantage given as a reward for improper behaviour or breach of duties.

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