

CAMERON FURNACE Co Ltd

Refractories Installation and Design

www.cameronfurnace.com



Anti-Corruption Policy

Introduction

Cameron Furnace Company Limited has a number of fundamental principles and values which it believes are the foundation of sound and fair business practice and as such are important to uphold. One such principle is a zero tolerance position in relation to corruption, wherever and in whatever form that may be encountered. This document is intended to build on the Company's Ethics Policy and to clearly state the standards and principles required to ensure conformance to legal requirements.

Legal Obligation

It is Cameron Furnace Company's policy to comply with all laws, rules and regulations governing anti-bribery and corruption law. As a United Kingdom company, Cameron Furnace Company is bound by the laws of the UK, which governs its conduct at both home and abroad. Under UK law, bribery and corruption is punishable for individuals by up to seven years imprisonment, and if the Company is found to have taken part in corruption, it could face an unlimited fine, be excluded from tendering for Government contracts and face untold damage to its reputation. It can easily be seen why Cameron Furnace Company takes its legal obligations in this area very seriously. Under UK law, the payment, or offer to pay bribes, or provision of or offer to provide gifts or anything of value for improper purposes to obtain or retain business or any other benefit, (whether for Cameron Furnace Company or any other party) is prohibited. Such payments or gifts are also forbidden under the terms of this policy and may result in immediate dismissal for those involved in their payment or receipt. Cameron Furnace Company is required to keep financial records and to have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

Policy

This policy applies to individual employees, agents, sponsors, intermediaries, consultants or any other persons or bodies associated with Cameron Furnace Company or any of its employees. Bribery is committed when an inducement or reward is provided in order to gain any commercial, contractual, regulatory or personal advantage for Cameron Furnace Company or another party. Further guidance concerning what is regarded by Cameron Furnace Company as unethical (which includes corrupt) payments can be found in the Company's Ethics Policy.

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January 1 2018

No bribes of any sort may be paid to or accepted from customers, suppliers, politicians, government advisors or representatives, private persons or companies. It is not permitted to establish accounts or internal budgets for the purpose of facilitating bribes or influencing transactions (slush funds).

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

Cameron Furnace Company recognises that market practice varies and what is normal and acceptable in one place may not be in another. Cameron Furnace Company also appreciates that to refuse a gift in certain circumstances would cause offence. The test to be applied in all circumstances is whether the gift or entertainment is reasonable and justifiable. What is the intention of the gift? 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. Cameron Furnace Company's Ethics Policy details this further under the heading 'Gifts and Entertainment'.

Expectations of Cameron Furnace Company Staff

The prevention, detection and reporting of bribery and corruption is the responsibility of all employees throughout Cameron Furnace Company. Suitable channels of communication by which employees or others can report confidentially any suspicion of bribery will be maintained.

Further Guidance

Inevitably, decisions concerning what is acceptable may not always be easy, particularly in the absence of minimum legal standards or where they are poorly enforced. If anyone is in doubt concerning whether a potential act constitutes bribery / corruption, the matter should be referred to their immediate manager, supervisor or the Company Secretary.

The Company Secretary has lead responsibility for policy implementation and this policy is signed by the Managing Director to demonstrate the Company's commitment.

Alan Martin
Managing Director

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