

Anti-Bribery and Corruption Policy Statement

Kent PHK Limited is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on Kent PHK's behalf is responsible for conducting company business honestly and professionally.

Kent PHK considers that bribery and corruption has a detrimental impact on business by undermining good governance and distorting free markets.

Kent PHK does not tolerate any form of bribery by, or of, its employees or any persons or companies acting for it or on its behalf. The Board and senior management are committed to implementing and enforcing effective systems to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

Kent PHK has published an Anti-Bribery and Corruption Procedure. The Anti-Bribery and Corruption Procedure applies to all employees, contractors, consultants, suppliers, clients and customers.

Employees and others acting for or on behalf of Kent PHK are strictly prohibited from making, soliciting, or receiving any bribes or unauthorised payments. As part of its anti-bribery measures, Kent PHK is committed to engage only in transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure.

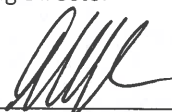
As part of the corruption element of this policy it is forbidden for any employee, sub contractor or supplier of the company to collude with third parties such that confidential information is passed which could have a detrimental affect to the Company or its customers. Such information might be financial, technical or strategic. Engineering development information is classed as intellectual property and as such is protected under law.

A breach of Kent PHK's Anti-Bribery policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct and immediate dismissal. Employees and other individuals acting for Kent PHK should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for Kent PHK.

The success of Kent PHK's anti-bribery measures depend on everyone playing their part in helping to detect and eradicate bribery.

Kevin Kent
Managing Director

Signed



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Kent House, Lower Oakham Way,
Mansfield, Nottinghamshire, NG18 5BY

www.kentgroup.com

01623 421 202

enquiries@kentphk.co.uk

