



Anti-Bribery & Corruption (ABC) Policy

The purpose of this document is to set out the responsibilities of Project Environmental Solutions Ltd (PESL) in observing and upholding laws and regulations on Anti- Bribery and Corruption.

Objective: The objective is to ensure that PESL follows a consistent approach to managing Anti-Bribery & Corruption and, in particular, is in compliance with the UK Bribery Act 2010, US Foreign Corruption Practices Act (FCPA) (1977) and the OECD Anti-Bribery Convention.

Scope: This policy covers all personnel, including Directors, employees, Associates, sub-consultants and sub-contractors. For third party service providers, PESL expects the adoption of practices consistent with the standards set out in this document.

PESL requires all employees to act ethically and requires that the standards laid out within this Policy are followed. Any instance of a breach, or suspected breach, of this Policy will be investigated and appropriate disciplinary action taken as necessary. This policy should be read in conjunction with other PESL guidance on gifts, entertainment, and Information Security.

Policy: This policy defines clear principles which outline PESL's position on bribery and corruption.

The Company must at all times ensure that it:

- Conducts its business fairly, honestly, transparently and with integrity
- Does not make or offer bribes, whether directly or indirectly, to gain business advantage
- Does not request or accept bribes, directly or indirectly, to give business or other advantage

Employees are required to:

- Refuse any bribe or inducement in a manner that is not open to misunderstanding or which may give rise to false expectations
- Report any offers of bribes or inducements received to a Director
- Report any suspicious behaviour to a Director
- Report any breaches of the policy, related principles or associated legislation to a Director

Any proven instance of Directors, employees, Associates, sub-consultants or sub-contractors accepting or offering a bribe will be considered an act of gross misconduct and the relevant authorities will be informed.

Political Contributions: It is PESL policy that it does not make any donations to political parties.

Reporting Suspicions: All suspicions or evidence of another employee, or anyone acting for or on behalf of PESL, who may have engaged in corrupt behaviour, must be reported at the earliest possible opportunity to a Director. All reports raised are taken seriously and no employee is discriminated against in any way as a result of reporting a concern in good faith.

Availability: This policy is approved for release to external parties such as Regulators, Auditors or clients on request. No further approval is required to issue this Policy.

Philip Smith - Director

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