Anti-Bribery and Corruption Policy Statement



OVERVIEW

This Policy is designed to provide adequate provision to address matters arising from The Bribery Act (2010) and to address issues regarding the giving and accepting of bribes. We recognise that involvement in bribery will reflect adversely on our business image and reputation.

Measures are therefore necessary to limit the exposure to bribery by:

- 1. Circulating to all staff (via the Staff Handbook) a clear and concise anti-bribery policy;
- 2. Enabling all staff to recognise and avoid bribery both personally and corporately;
- 3. Taking consistent and vigorous action against any individual involved in bribery..

STATEMENT

United Automation Limited prohibits the offering, giving, solicitation or acceptance of any bribe (whether cash or other inducement);

- stto or from any other person, company, business, or organisation, whether a public official or body, or private person or body;
- *by any individual employee, or any other person acting on the Company's behalf;
- in order to gain any commercial, contractual or regulatory advantage for the Company which is in any way unethical;
- *or with the intention (successful or otherwise) to gain any personal or corporate advantage, for the individual or anyone connected with the individual.

In basic terms, this policy therefore prohibits any inducement which is intended to result in a gain or advantage to the recipient or the employer, and which is intended to influence the recipient in making his, her or their decision.

REASONABLE HOSPITALITY AND PROMOTION This policy is not designed to prohibit reasonable and courteous hospitality that is both proportionate to the business involved, and might be considered as customary and normal in the market sector. Examples of reasonable hospitality and promotion would be normal and appropriate hospitality and gratuities in personal recognition or thanks; the token exchange of gifts of a festive nature; or promotional gifts such as annual calendars, pens, key rings, notepads, etc..

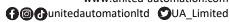
WHEN IN DOUBT If a member of staff is unsure or concerned that a particular act, gift or favour may constitute bribery, he or she should, without fear of recrimination, refer the matter to an uninvolved senior colleague before proceeding.

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