
POLICY ON ANTI-BRIBERY & CORRUPTION

It is the policy of 1st Millennium Electronics Ltd (The Company) to conduct business in an honest and ethical manner. As part of that, the Company takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships, wherever it operates, and implementing and enforcing effective systems to counter bribery.

The Company will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it conducts business, including, in the UK, the Bribery Act 2010 (the ACT), which applies to conduct both in the UK and abroad.

This policy applies to all individuals working for or on behalf of the Company at all levels and grades, whether permanent, fixed-term or temporary, and wherever located, including consultants, contractors, seconded staff, casual staff, agency staff, volunteers, agents, sponsors and any other person who performs services for or on behalf of the Company.

COMMUNICATION AND ADVICE

This Anti Bribery and Corruption policy will be communicated to each and every employee through the use of induction training. All employees are encouraged to communicate any Anti Bribery or Corruption issue directly with their line management in order that the procedures and operations of 1st Millennium can be maintained and enhanced to provide an improved working environment.

This policy will be displayed at each location where 1st Millennium operates.

STEPHEN READ

Director

For and on behalf of

1ST MILLENNIUM ELECTRONICS LIMITED