



Metro Rod Ltd Anti-Bribery & Anti-Corruption Policy Statement

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all of our business dealings and relationships wherever we operate, and to implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

The purpose of this policy is to:

- set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

Of course we frequently tender or bid for substantial contracts, in competition with others, and in turn, we are able to place substantial orders for the supply to us of goods or services. We acknowledge that, in these scenarios, risks arise of inducements being offered, given or received in order to 'get ahead of the competition'.

In this policy, 'third party' means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, contractors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

In this policy, 'we' and/or 'us' mean Metro Services Group Limited and its subsidiary companies, together referred to as 'Metro Services Group'.

This policy applies to all individuals working at all levels and grades, including directors, senior managers, employees (whether permanent, fixed-term or temporary), consultants, contractors, sub-contractors, agents, joint venture partners, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, sponsors, or any other person associated with us, wherever located (collectively referred to as 'workers' in this policy).

The Board of Directors of Metro Services Group has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Each business division within the Metro Services Group has an appointed Compliance Manager who has primary and day to day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate training on it.

Stephen Hemsley, Managing Director
August 2017

This policy is maintained by Metro Rod Ltd's SHEQ department and will be publicised throughout the company on noticeboards, internal intranet facilities and made available to external parties on request.