



Anti-corruption, fraud and bribery policy statement

Harpers Environmental is committed to conducting all of its business in an honest and ethical manner, and has a zero tolerance policy towards fraud, bribery and any form of dishonesty in its transactions.

Harpers Environmental will uphold all laws relevant to countering bribery, fraud and corruption in all the jurisdictions in which it operates. However, no matter where the Company, its staff or agents operate, it and they must abide by the laws of the UK, including the Bribery Act 2010, in respect of conduct both at home and abroad.

Bribery and corruption are punishable for individuals by up to ten years imprisonment and or an unlimited fine, and if the Company is found to have taken part in corruption it could also face a fine and be excluded from tendering for public contracts, as well as suffering damage to its reputation.

Harpers Environmental could also attract liability under the Bribery Act 2010 if a person associated with it is found to have paid a bribe on its behalf, and the Company did not have adequate procedures in place to prevent such conduct. Harpers Environmental therefore takes its legal responsibilities very seriously. Likewise fraud may lead to civil and/or criminal proceedings.

Any allegation that a member of the Company has acted in a manner that is illegal or inconsistent with this Policy will be treated seriously, regardless of the seniority of those involved. Disciplinary action up to and including dismissal or expulsion may result. Where it is believed that a criminal offence may have been committed, the police and other relevant bodies may be informed.

Signed by Director with overall responsibility for Health & Safety:

Gordon Mackay

A handwritten signature in black ink, appearing to read "Gordon Mackay".

Managing Director

Dated 19 June 2019