

ANTI-CORRUPTION POLICY

For the purposes of this Code, 'corruption' includes bribery, extortion, fraud, deception, collusion, cartels, abuse of power, embezzlement, trading in influence, money-laundering and similar criminal activity.

Corruption inhibits economic growth, is damaging to business, and may result in criminal and civil liability and penalties for organisations and individuals.

Triton Showers prohibits its directors, managers and all other employees from engaging in any form of corruption in relation to Triton Showers' business and affairs.

Specifically such directors, managers and all other employees should:

- a) Act at all times honestly and without deception
- b) Not knowingly or recklessly do any of the following, or participate in any activity which involves any of the following:
 - Offer, give, demand or accept any bribe or other improper advantage
 - Participate in any dishonest or deceptive activity, including in relation to any selection, certification, approval or management process
 - Provide, conceal, or approve work, materials, equipment or services which are not of the quality and quantity required under contract
 - Provide false, inaccurate or misleading information
 - Dishonestly withhold information
 - Make or submit false, inaccurate, misleading or exaggerated records, invoices, claims, applications for variations or extensions of time, or requests for payment
 - Dishonestly refuse or fail to approve, or delay in approving, work, materials, equipment, services, invoices, claims, applications for variations or extensions of time, or requests for payment
 - Dishonestly refuse or fail to pay, or delay in paying, sums due

Any director, manager or other employee within Triton Showers should in addition to the above:

- Not instruct, authorise or condone, expressly or impliedly any corrupt activity
- Make proper enquiries regarding any suspicion of corruption which becomes apparent
- Take reasonable preventative measures to stop corruption for which Triton Showers may be liable
- Report any suspicion of corruption to the Board of Directors and to the person responsible for compliance with Triton Showers anti-corruption programme

Triton Showers will use all reasonable endeavours to conduct its business and affairs so as to ensure that it does not engage in or facilitate any form of corruption.

In order to minimise the opportunity for corruption this policy has been adopted for political and charitable donations and the provision of gifts or hospitality to any person or organisation, details of which are below.

A facilitation payment is a payment made to encourage a person to carry out his/her duty. Even though facilitation payments are in many cases obtained by way of extortion, they are nevertheless a form of corruption and the making or receiving of a facilitation payment is a criminal offence in many jurisdictions. Triton Showers prohibits the making of any facilitation payment unless permitted under local law, save in circumstances where the personal safety of any person is endangered.

Triton Showers has adopted a corporate anti-corruption programme to enable it to comply with this Code. Triton Showers will properly implement this programme and review it on an annual basis to ensure that it is operating effectively.

Gifts, Donations & Hospitality

Triton Showers does not permit any employee of Triton Showers, directly or indirectly, whether in his/her personal capacity or on behalf of Triton Showers:

- to solicit any gift or hospitality in the course of his/her employment
- to offer or give to, or receive from, any Connected Person any of the following:
 - a personal or corporate gift in excess of a value of £100;
 - any personal or corporate gift delivered to any address other than their place of work;
 - hospitality, which has not been pre-authorized with the line director or in the case of a director, the person responsible for compliance with Triton Showers anti-corruption programme;
 - to offer donations, which have not been pre-authorized with the line director or in the case of a director, the person responsible for compliance with Triton Showers anti-corruption programme; any political, charitable, or not-for-profit organisation, where a trustee, manager or beneficiary of that organisation is a Connected Person, or is related to a Connected Person;
 - to offer, give, or receive any gift or hospitality which is in breach of the applicable law. Consequently, the law must be checked before any gift or hospitality is offered, given or received;
 - a 'Connected Person' means any organisation or individual (other than an employee of Triton Showers) who has had, has, or may have any connection with or influence over the business of Triton Showers;
 - all employees of Triton Showers are required to enter details into the Benefits Register of all gifts and hospitality made and received which are permitted under paragraphs 1 and 2. The Benefits Register is inspected regularly by the management of Triton Showers and by its auditors;
 - in the interests of transparency, this gifts and hospitality policy is published on the Triton website. In addition, the person responsible for compliance with Triton Showers anti-corruption programme advises all suppliers and customers of the policy.

In order to ensure that all employees are bound by this gifts and hospitality policy and fully understand it:

- Compliance with this gifts and hospitality policy is a condition of each employee's employment contract.

- Guidance as to how to comply with this gifts and hospitality policy forms part of the anti-corruption training provided to employees by Triton Showers.
- Triton Showers will use all reasonable efforts to ensure compliance with this gifts and hospitality policy.
- If any person, whether or not an employee of Triton Showers, is aware of any gift or hospitality which is, or may be, in breach of this gifts and hospitality policy, a report may be made to the Finance Director either by telephone on 024 7632 4465 or via email at chris.whitell@tritonshowers.co.uk. This report may be made anonymously.

Definitions:-

- “Gift: a financial or other benefit, offered, given, solicited or received without any obligation to provide any benefit in return.
- Hospitality: the offer or provision of any facility at a free or reduced rate which is designed to increase the comfort and pleasure of the person to whom the hospitality is being provided. Some examples are free or reduced rate entertainment, meals, accommodation, travel, and car hire.
- Political donation: usually a financial gift made to a political party or other political organisation.
- Charitable donation: usually a financial gift made to a charity, other public welfare organisation, or not-for-profit organisation.”