

Anti-Bribery & Corruption Policy



The AES Engineering Limited Group (here after referred to as AESSEAL®); designs, manufactures and supplies, reliability focussed products and services.

AESSEAL® is committed to the highest standards of ethical behaviour. The Company requires all employees, business associates and other stakeholders, with whom we conduct business with, or who conduct business on behalf of, or for us, to comply with this policy without exception.

It is the policy of AESSEAL® to fully comply with all applicable Anti-Bribery laws and regulations; including, but not limited to, the U.S. Foreign Corrupt Practices Act ("FCPA"), and the U.K. Bribery Act, in relation to the prohibition of bribery and corrupt payments. As part of this AESSEAL® is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices.

AESSEAL® does not take part in bribery or other inducements, corruption or, any other illegal acts and, will not knowingly take part in any transactions where corrupt practices form any part of the arrangement. Any such acts will lead to dismissal or termination of any business relationship.

AESSEAL® is committed to, and supports, the implementation of the Anti- Bribery Management System which is described in the Business Assurance Manual and complies with the requirements of ISO 37001.

The AESSEAL® Anti-Bribery Management System: -

- Supports the establishment, implementation, maintenance and continual improvement of the AESSEAL® anti-bribery management system and the associated objectives.
- Prevents AESSEAL® from becoming involved with any corrupt practices
- Encourages the raising of concerns without fear of reprisal.
- Deals with any activities that may need further investigation and action.
- The anti-bribery compliance committee is adequately resourced and assigned to person(s) who have the appropriate competence, status, authority and independence.

This policy and the effectiveness of the Anti-Bribery Management system will be reviewed on an annual basis as part of the Management Review by the Compliance Committee.

'Our Business Principles govern the manner in which we at AES Engineering Ltd Group conduct ourselves. They have been set by the Group and are a requirement placed upon each individual operating company. We apply these principles across the Group, they are subject to regular review and comment upon them is encouraged.'

A handwritten signature in black ink that reads 'C J Rea'.

C. J. Rea
Managing Director