

Bribery and Anti-Corruption Policy Statement

Introduction

LASLETT INTERNATIONAL LIMITED (LIL) have a zero tolerance policy on bribery and corruption in accordance with the Bribery Act 2010. We do not give or accept bribes (Including facilitation payments) or other illegal inducements, and will not condone any such actions by its employees, agents, representatives and consultants.

LIL will never penalise any member of staff, employee, agent, representative or consultant for refusing to give a bribe or facilitation payment, notwithstanding that such refusal might result in the LIL losing or not winning business.

The directors of LIL are responsible for implementing these anti-corruption policies throughout the business.

Laslett International does not tolerate corruption in any form, whether direct or indirect.

Corruption causes poverty and suffering, inhibits economic growth, is damaging to business, and may result in criminal and civil liability and penalties for LIL and its individual employees.

LIL prohibits bribery, including facilitation payments. Bribery may be defined as the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action with the intent of gaining any commercial contractual, regulatory or personal advantage. No bribes of any sort may be paid to or accepted from clients, contractors, suppliers, agents, politicians, government officials, individuals or companies.

Laslett International acts with integrity, fairness and transparency

LIL insists on honesty, integrity and fairness in all aspects of its business and expect the same in business partners with whom it does business, including agents and other third parties.

Laslett International complies with legal and regulatory anti-corruption requirements

LIL business spans a range of activities and geographical locations. LIL must comply with all applicable laws and regulation of the countries in which it operates, with the UK Bribery Act 2010 serving as its benchmark for anti-corruption compliances.

Laslett International has put into place clear policies

LIL has put into effect the values and principles set out in this Policy Statement, and has formulated a Code of Conduct. LIL actively implement the Code of Conduct. All LIL directors and employees are required to comply with the Code of Conduct.

- All LIL directors and employees are given training on how to use and follow the Code of Conduct.

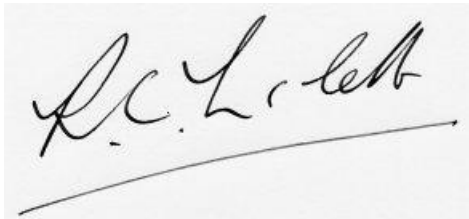
- Guidance must be provided on the appropriateness and the levels of gifts and corporate hospitality, and political, charitable and sponsorship payments.
- In order to identify and counter corruption risks, risk assessment and appropriate due diligences must be undertaken for all business processes in respect of LIL's business and project operations across the various countries in which LIL operates, and in respect of the business partners and agents with whom LIL engages.
- LIL policy is to have in place processes and controls to adequately report any incidents of bribery. It is our policy that employees should be able to internally report any such events in confidence and without risk of reprisal.
- Appropriate action must be taken if our policies are breached by anyone within the LIL or a Third Party acting on its behalf.

LIL review all its policies on annual basis to ensure that that they operating effectively.

Conclusion

This Policy Statement is made available to all Company employees and in appropriate Company corporate communications.

Signed by:

A handwritten signature in black ink, appearing to read 'R. C. Laslett', is written over a horizontal line.

Robert C. Laslett CEng FEI FIET HonFAPM FACostE FRSA FloD

Managing Director

LASLETT INTERNATIONAL LIMITED

16th February 2018