



Anti-Bribery & Corruption Policy of City Change Management

1 Anti-Bribery and Corruption

1.1 Policy statement

CCM expects its employed staff and sub-contractors to demonstrate honesty, integrity and fairness in all aspects of their business dealings and exercise appropriate standards of professionalism and ethical conduct in all their activities. CCM expects the same approach to doing business from its business partners and suppliers.

Pursuant to this CCM will not tolerate bribery¹ or corruption² in any form and has a 'zero tolerance' approach to any breach of this policy.

1.2 Application

This means that CCM and its employees and sub-contracted staff will never seek, accept or give a bribe, facilitation payment, kickback or other improper payment. We must also always ensure that we operate with appropriate transparency in all our business dealings.

1.3 Our Policy

We will take appropriate steps to ensure that:

- 1.3.1 We do not, directly or indirectly, offer, promise, give, accept or demand a bribe or other undue advantage (including excessive gifts and hospitality) in order to obtain or retain business, or gain any other improper advantage.
- 1.3.2 We do not offer, nor give in to demands, to make illicit or illegal payments to agents, public officials (at whatever level), or the employees of business partners or anybody else that we do business with.
- 1.3.3 We engage and remunerate agents and other third parties only for legitimate services and adopt appropriate transparency in our approach.
- 1.3.4 We promote employee awareness of, and compliance with, company policies against bribery and corruption through appropriate dissemination of our own procedures (including disciplinary procedures) policies and training programmes on induction and subsequently.
- 1.3.5 We do not make illegal or inappropriate contributions to candidates for public office or to political parties or to other political organisations.
- 1.3.6 We raise awareness of the need to combat bribery and corruption with our business partners by publication of this Policy and (where appropriate) relevant contractual provisions and support initiatives designed to reduce the risk of bribery and corruption.

¹ Definition: The receiving/offering/giving/providing/requesting/accepting of a financial or other advantage, in order to seek to induce a person or to induce a person to give improper assistance in breach of their duty, or to otherwise influence someone with the underlying purpose of obtaining/retaining business, or an advantage in the course of business. "Bribery" for this purpose includes so-called "facilitation" or "grease" payments, defined as non-discretionary payments made to government or public officials to speed up routine administrative processes, even if such payments are nominal in amount.

² Definition: The misuse of entrusted power/breach of duty for personal gain

2 SIGNING PROVISIONS

On behalf of City Change Management Ltd by

(Authorised Signature)

Name:.....

Title:

Date:.....

On behalf of the Employee or Service Provider by

(Authorised Signature)

Name:.....

Title:

Date:.....