

SPRING ANTI-BRIBERY POLICY

19th September 2016

OBJECTIVE

The primary objective of the Spring CCR Ltd Anti-Bribery policy is to ensure compliance with anti-bribery legislation in the UK, that being the sole geographical area in which we currently operate.

DEFINITIONS

For the purposes of this policy, bribery is defined as *'an offer or receipt of any gift, fee, reward or other advantage to or from any person as an inducement to do something in the conduct of our business within our Company and/or with Clients, which is dishonest, illegal or a breach of trust'*.

For the purposes of this document, a Representative shall be any person employed directly or indirectly by Spring CCR Ltd (to include Associates, Employees, Directors and Contractors) to act for or on behalf of the Company itself and any Client.

Principal Prohibition

As a Spring CCR Ltd Representative **you must not:**

1. Offer, promise, give, request, agree to receive or accept a bribe; or
2. Do anything to circumvent controls in place to ensure compliance with this policy.

Principal Actions you must take:

1. The Spring CCR Ltd Representative must notify a Director of Spring CCR Ltd immediately in the event that a person acting on their own or on a Client's behalf is suspected or convicted of bribery or corrupt practices or that they themselves suspect they may have done so.
2. The Spring CCR Ltd Representative must advise a Director of hospitality and charitable donations made or received with a value of £50 or more for entry onto the 'Hospitality and Charitable Donation Log' (see below).

Principle Actions the Company must take:

1. The Director will escalate any notification where appropriate to Client and monitor thereafter to identify and prevent any recurrence. The Director concerned must create a written Incident Report of any event of this nature.
2. A Director must maintain a log of all hospitality and charitable donations made or received with a value of £50 or more.

Due Diligence

The purpose of due diligence is to identify and mitigate the risk that a bribe is offered to obtain or retain business or to gain an advantage relating to the Client, to Spring CCR Ltd, its Representative(s) or to the business of Spring CCR Ltd, the Client or any Third Party.



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Monitoring and Record Keeping

Due diligence is performed by the following process:

1. Assessment of Risk: All Spring CCR Ltd Representatives must complete an **Anti-Bribery Risk Assessment Record** once a year on the conduct of their business and the relationships with each Client in their care (see form below).
2. These Records must be monitored by a Director and retained at the Company's Registered Office for ten years.
3. Where deficiencies are identified, Spring CCR Ltd Representatives must resolve them without delay, report such to a Director who will escalate where appropriate to Client and monitor thereafter to identify and prevent any recurrence. The Director concerned must create a written Incident Report of any event of this nature.

Gifts, Entertainment & Hospitality

1. Spring will conduct an annual Anti-Bribery Risk Assessment to determine the efficacy of the above process to counter the bribery risks associated with the offering and acceptance of gifts, entertainment and hospitality.
2. Representatives must not offer or accept, either personally or on behalf of a Client, any gifts, entertainment and hospitality intended to unduly influence a decision-maker in order to gain or retain business.
3. For the avoidance of doubt 'customary hospitality' such as coffee and sandwiches of a value less than £35 is outside the scope of this policy and does not need to be logged.
4. Hospitality etc. to a value of £50 or more **must** be logged by email to a Director who maintains the company-wide Hospitality and Charitable Donations Log.

Charitable Donations

1. As a general rule Representatives may not make any donations to charities on behalf of any Client.
2. In the event a Charitable Donation is deemed worthwhile and desirable, it must not exceed a value of £50 and **must** be logged by email to a Director.

Political Donations

No Representative may make any political donations on behalf of any Client.

Facilitation Payments

Facilitation payments are illegal under UK law. A facilitation payment is a payment, which is made to expedite or secure the performance of a routine non-discretionary action, such as processing papers, issuing permits, and other actions by a person, which they are already bound to perform. No Representative may make a facilitation payment.

Awareness, Training and Review



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1. This Policy must be issued to all Representatives on inception and at every update and Review.
2. All Representatives must complete, sign and date the Spring CCR Ltd's Representative Anti-Bribery Policy Undertaking form and return it to the Company's Registered Office where it will be retained until updated versions of the Policy are issued.
3. A Director or person allocated to the task will Review the contents of the Policy once a year.
4. Once a year at a full Company Meeting, all Representatives will be reminded of their responsibilities under this Policy.
5. To ensure a basic level of training, once a year at a full Company Meeting of all Spring CCR Ltd Representatives, a nominated person will explain the nature of bribery and illegal incentives and bring to everyone's attention any new requirements.
6. All Spring CCR Ltd Representatives must remain alert to any infringement of this Policy and maintain a constant awareness of both their own conduct and that of others in relation to this Policy.

End. Spring CCR Ltd Anti-Bribery Policy 190916



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SPRING REPRESENTATIVE'S ANTI-BRIBERY POLICY UNDERTAKING

1. I confirm that I have read the March 2016 **Anti Bribery Policy** dated 08.03.16 and will conform with the requirements and responsibilities therein.
2. I undertake to remain aware at all times of my own conduct and that of others in the course of doing business on behalf of Spring CCR Ltd. in relation to the risk of bribery.
3. I will complete an **Anti-Bribery Risk Assessment Record** at least once a year for each Client of Spring CCR Ltd. that I am involved with in any capacity.

Signed by:

Date

Print Name:

In the capacity of: Director, Associate, Employee, Contractor (delete as appropriate)

PLEASE RETURN THIS DOCUMENT TO:

Spring CCR Ltd., The Old Smithy, Broadway, Chilton Polden, Somerset, TA7 9DN

End. Anti-Bribery Policy Undertaking 080316



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SPRING REPRESENTATIVE'S ANTI-BRIBERY RISK ASSESSMENT RECORD

Date of Assessment:

Your Name:

Capacity in which you are assessing:
(I.e. Director, Associate, Employee, Contractor)

Client Names with their Organisation and Division (as appropriate): (list below)

I have carefully considered the past, current and anticipated conduct of myself and each of the above named clients in the light of the Spring CCR Ltd. Anti Bribery Policy and can confirm that I have found no identifiable risk or suspicion of risk with my conduct or with that of the above listed Clients.

I identify below these Clients where I suspect a breach may have taken place or may take place in the future (or write 'None').

Signed:

Print Name:

PLEASE RETURN THIS DOCUMENT TO:

Spring CCR Ltd., The Old Smithy, Broadway, Chilton Polden, Somerset, TA7 9DN

End. Anti-Bribery Risk Assessment form 080316

