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ANTI- BRIBERY STATEMENT

Dodd Group is committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. Every employee and individual acting on Dodd Group's behalf is responsible for maintaining its reputation and for conducting Company business honestly and professionally.

Dodd Group will not tolerate any form of bribery, whether direct or indirect by, or of, its employees, officers, agents, consultants or any persons or companies acting for it or on its behalf.

Dodd Group is committed to implementing and enforcing effective systems throughout Dodd Group to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

Dodd Group has issued a new Anti-Bribery Policy outlining Dodd Group's position on preventing and prohibiting bribery which is posted within the Employee Handbook and on Dodd Group's website. The Anti-Bribery Policy applies to all employees, as well as agency workers, consultants and contractors. All such individuals are required to familiarise themselves and comply with the organisation's Anti-Bribery Policy with immediate effect.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Employees and others are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.

Any breach of Dodd Groups Anti-Bribery Policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct, and immediate dismissal. Employees and other individuals acting for Dodd Group should note that bribery is a criminal offence that may result in imprisonment and/or unlimited fines.

Dodd Group will not conduct business with service providers, agents or representatives that do not support the organisation's anti-bribery objectives. Dodd Group reserves the right to terminate its contractual arrangements with any third parties acting for, or on behalf of, Dodd Group with immediate effect where there is evidence that they have committed acts of bribery.

The success of Dodd Group's anti-bribery measures depends on all employees, and those acting for Dodd Group, playing their part in helping to detect bribery. Therefore, all employees and others acting for, or on behalf of, Dodd Group are encouraged to report any suspected bribery in accordance with the procedures set out in the anti-bribery policy. Dodd Group will support any individuals who make such a report, provided that it is made in good faith.