

HC SLINGSBY PLC AND SLINGSBY MAIL ORDER LIMITED

ANTI-BRIBERY AND CORRUPTION POLICY

HC Slingsby PLC (“Slingsby”) is committed to conducting its business around the world with the highest degree of integrity. This commitment includes a zero tolerance approach towards all forms of bribery and corruption.

This Code of Conduct has been formally approved by the Board of Directors of Slingsby and extends to all of Slingsby’s business dealings and transactions in all countries around the world in which Slingsby or its joint venture partners, agents, advisors and suppliers operate.


It is a mandatory requirement of Slingsby that all directors, officers, employees, joint venture partners, agents, advisors, and suppliers comply with this Code of Conduct and you should ensure that you are fully familiar with its contents, refreshing your memory as necessary from time to time. Slingsby has appointed a Compliance Officer, Mr. Morgan Morris to whom you can address any queries or concerns.

Engaging in bribery and corruption is unlawful and any employee, director or officer of Slingsby found to have breached this Code of Conduct will be liable to disciplinary action which may result in dismissal or other serious sanctions. Breaches of this Code of Conduct by joint venture partners, agents, advisors, suppliers or third party contractors may result in immediate termination for breach of all contracts with Slingsby.

Further, engaging in bribery and corruption whether at home or abroad will constitute a criminal offence which will expose both Slingsby and you personally to serious criminal sanctions including the risk of imprisonment.

All of us share a responsibility to ensure compliance with this Code of Conduct and should you become aware that any person acting or purporting to act on the behalf of Slingsby may have committed an act of bribery or corruption then you must report your concerns immediately to the Compliance Officer. As outlined in the Slingsby Company Handbook Slingsby is committed to treating its employees fairly and to ensuring that an environment is maintained in which bullying, harassment and victimisation will not be tolerated - you can be assured that reporting any concerns will not result in you receiving any negative or retaliatory treatment.

I know that everyone within Slingsby shares the commitment of the Board of Directors to ensuring that the highest standards of business integrity are maintained and that I can count on you for your full support.



Dominic Slingsby
Operations Director

05 February 2020