

**James Walker Group**  
**Global Anti-Corruption Policy and Procedures**  
**Statement of Group Policy**

The James Walker Group of Companies is committed to the highest standards of ethical conduct and integrity in its business activities globally and the compliance with all local and international laws. This statement outlines our position on transparency, regulatory compliance and preventing and prohibiting bribery and corruption.

We will not tolerate any form of bribery by, or of, our employees, agents or consultants or any person or body acting on our behalf. The Group Board is committed to implementing appropriate and effective measures to prevent, monitor and eliminate bribery and corruption. These measures are set out in the Global Anti-Corruption Policy and Procedures ("Global Policy") and it is mandatory for all staff and service providers to comply with it. For an explanation of who may be a service provider, please see section 4 of the Global Policy.

The Strategic Business Unit ("SBU") Boards are responsible for implementing this policy on behalf of the Group Board within their SBUs. The Group Company Secretary is also the Group Compliance Officer with overall responsibility for the compliance function (Tricia Collins; +44 (0)1483 746129; tricia.collins@jameswalker.biz).

Countries in which we conduct business have adopted anti-corruption laws designed to combat the bribery, or other improper influence, of persons including government officials. Anti-corruption laws typically include both anti-bribery provisions as well as financial record-keeping requirements, and anyone who breaks those laws can be subject to serious criminal and civil penalties.

The Global Policy has been designed to achieve compliance with all applicable anti-corruption legislation and to ensure that all members of staff and service providers adhere to the highest ethical standards of conduct. Applicable legislation includes the UK Bribery Act 2010, the United States Foreign Corrupt Practices Act and the equivalent laws in the countries where we do business.

The Group's anti-corruption mission statement is:

- to ensure that the Group and its employees adopt a zero tolerance approach to bribery and corruption;
- to conduct business within the regulatory and legal framework of the jurisdictions in which it operates;
- to ensure that the Group and its employees act professionally, fairly and with business integrity;
- to operate to high ethical standards and with complete transparency.

We undertake to assess risks and avoid poor practice, and to ensure that employees and those providing services to the Group operate within these internal policies and procedures. We will provide appropriate training to ensure that everyone is aware of their obligations and equipped to identify and deal with the issue of bribery and corruption. We will fully investigate any instances of alleged or suspected bribery.

Peter Needham  
Chairman and Chief Executive  
21 February 2017