

ANTI BRIBERY POLICY

This document sets out the Company's policy and procedures in relation to the Bribery Act 2016.

Background

Bribery is the provision of financial or other advantage to induce the receiving party to perform their functions improperly, or to reward them for having done so. All Staff should be aware that Bribery is a criminal act, with penalties for individuals (including Staff and the Company Directors) up to 10 years and an unlimited fine.

Bribery of the Company or its Staff

Land Science operates in the Construction Industry, on projects predominantly within the UK. There may be many varied vested interests for which clients may wish to induce Land Science or members of its Staff to act improperly. For instance a client may try to persuade us to provide advice that is favourable to them, outside the scope of relevant laws and regulations, for instance in a land transaction or in dealings with regulators. You may be offered cash or other inducements for providing misleading or inaccurate advice.

Bribery by the Company or Its Staff

Whilst there may plausibly be a risk of any organisation bribing employees or 3rd parties, the Company considers this to be a negligible risk given the overall policies, procedures, and culture. Such scenarios may be withholding payments to contractors on

Top Level Commitment

The management of Land Science is committed to prevent Bribery by (and of) the Company and its employees. The Company is not aware of any current or historic inducement on its Staff or 3rd parties to perform their functions improperly, or reward them for having done so. The Company commits to ensure this continues to be the case.

Proportionality

The business is an SME currently employing 19 members of Staff at one location. Of these staff, approximately ¼ are in the field at one time, working on a variety of sites ranging between private residences through to major construction projects. The value of projects can range from £10's of thousands to £10's of millions.

Risk Assessment

A risk assessment has been prepared, as appended to this Policy document. The overall level of risk is more than say a one-off high street retailer, but less than a multinational defence contractor. Overall, the risk is deemed to be towards the lower end of the scale.

Due Diligence

The Company commits to remain diligent at all times in monitoring and updating this Policy.

Communication

This Policy will be communicated to staff:

- To all existing staff immediately
- To any future staff joining, on their induction
- Any updates will be communicated as they arise, and
- Bribery will be brought up as part of ongoing project and team management meetings

Monitoring and Review

All risk assessments are dynamic live documents, and should be monitored on an ongoing basis. This entire document should be reviewed at a period of approximately every 12 months as part of the Company's annual review cycle.

Procedures

Based on the risk assessment, the Company has identified the following procedures:

- Staff shall be briefed to ensure they are aware of Bribery and understand the risk assessment
- Staff who become aware of a possible issue should contact the Managing Director (or failing that another Senior Manager).
- At no point are Staff to consider offering or accepting bribes.
- The overall risk is very low and the Company will continue to monitor.
- The Company must proceed with care where private Clients are foreign nationals, or where clients are a public body of another country.

Risk Assessment

Aspect	Description	L	S	R	Control measures	Residual Risk
Making bribes	<ul style="list-style-type: none"> Bribery by the Company to its Staff or 3rd parties. 	2	4	3	<ul style="list-style-type: none"> The Company commits and undertakes that it has not and will not be involved in Bribery. Bribery should be clearly defined in the Policy and Staff made aware of the issues. Any member of Staff who becomes aware of a possible issue should contact the Managing Director or other Senior Manager. 	<ul style="list-style-type: none"> Very low. To be monitored on an ongoing basis.
	<ul style="list-style-type: none"> Bribery by a member or members of Staff, to 3rd parties (e.g. suppliers, subcontractors) or others within the Company. 	2	4	3	<ul style="list-style-type: none"> The Company will state that at no point Staff are to consider offering bribes. No member of staff will have unrestricted and unmonitored access to Company accounts or funds. The Company does not routinely handle cash and staff have no access to cash. Any member of Staff who becomes aware of a possible issue should contact the Managing Director. If Staff feel that they are in such a position where they might consider bribery, they should contact the Managing Director. Any act or attempted act of Bribery by any member of Staff will be considered under the Disciplinary Policy and may be deemed to be Gross Misconduct. Acting to prevent or avoid a situation will be considered more favourably. Acting to cause, facilitate or cover-up will not. 	<ul style="list-style-type: none"> Very low. To be monitored on an ongoing basis.
Receiving bribes	<ul style="list-style-type: none"> Bribery of Staff by a 3rd Parties or other members of Staff 	2	4	3	<ul style="list-style-type: none"> Any member of staff aware of such circumstances must report it to the Managing Director immediately. 	<ul style="list-style-type: none"> Very low. To be monitored.
Foreign public officials	<ul style="list-style-type: none"> Bribery involving foreign public officials 	2	4	3	<ul style="list-style-type: none"> The Company's work is currently based on sites only in the UK. Any sites abroad will need careful planning and approval of the Managing Director. The Company should identify whether they are a foreign public official, or public body of another Country, and proceed with care. 	<ul style="list-style-type: none"> Very low. Company to proceed with care.

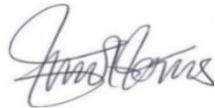
L= Likelihood, S= Severity, R=Risk (as defined below)

		Likelihood				
		Unlikely =1	Very low =2	Low =3	Moderate =4	High =5
Severity	Unlikely =1	Negligible =1	Negligible =1	Negligible =1	Negligible =1	Negligible =1
	Very Low =2	Negligible =1	Negligible =1	Very low =2	Low =3	Low to moderate =3.5
	Low =3	Negligible =1	Very low =2	Low =3	Low to moderate =3.5	Moderate =4
	Moderate =4	Negligible =1	Low =3	Low to moderate = 3.5	Moderate =4	High =5
	High =5	Negligible =1	Low =3	Moderate =4	High =5	High =5

Declaration

This document represents the policy of Land Science Ltd

Authorised By:



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Dated: 07/10/2019