

Cory Riverside Energy Anti-Bribery and Corruption Policy



CRE ANTI-BRIBERY & CORRUPTION POLICY

Cory Riverside Energy Group companies¹ (“CRE”) is one of the UK’s leading resource management, recycling and energy recovery group of companies which seeks to be outstanding and innovative in every aspect of waste management in partnership with local authorities and industry. In order to achieve this aim, CRE has developed several policies of which this Anti-Bribery and Corruption Policy is one.

What is the purpose of this Policy?

This document sets out CRE’s policy on preventing and prohibiting bribery and corruption, in accordance with the Bribery Act 2010 (the “Act”) and in line with all regulatory and statutory compliance agreements it complies with.

CRE’s business ethics and general policy is to conduct business fairly, honestly and openly and to take a zero-tolerance approach to bribery and corruption. Bribery and corruption will not be tolerated by employees, agents or consultants or any person or body acting on behalf of CRE and firm action will be taken against any individual(s) who choose to be involved in bribery.

The Board and Senior Management is committed to carrying out its business fairly, honestly and openly whilst implementing effective measures to prevent, monitor and eliminate bribery.

Who does this Policy apply to?

The Bribery Act 2010 applies to all bodies or partnerships incorporated or formed in the UK, or that carry out their business in the UK wherever they are incorporated or formed.

This Policy and associated guidance and procedures apply to all Associated Persons² within the UK and overseas. Every employee and Associated Persons acting for, or on behalf of CRE, is responsible for maintaining the highest standards of business conduct. Any breach of this Policy is likely to constitute a serious disciplinary, contractual and possibly criminal offence for the individual concerned and may cause serious damage to the reputation and standing of the CRE brand.

¹ The “CRE” Group consists of Dusty Topco Limited and all of its subsidiaries (Dusty Bidco Limited; Denmark Topco Limited; Denmark Holdco Limited; Viking Consortium Acquisition Limited; Cory Environmental Holdings Limited; Cory Ship Repair Services Limited; Riverside Energy Park Limited; Cory Riverside Energy Finance Limited; Cory Riverside Energy Holdings Limited; Cory Riverside (Holdings) Limited; Cory Environmental Limited; Riverside Resource Recovery Limited & Riverside (Thames) Limited).

² “Associated Persons” mean all employees, officers, temporary workers, consultants, contractors, service users, interns, apprentices and agents acting for or on behalf of CRE

Additionally, CRE may face criminal liability for unlawful actions taken by its employees or Associated Persons under the Bribery Act 2010. Every employee, director and Associated Person is required to familiarise themselves and comply with this Policy and its associated procedures, including any future updates that may be issued from time to time.

CRE will require a contractual undertaking from its suppliers, agents, customers and other third party Associated Persons that it has its own anti-bribery and corruption policy and equivalent training programmes in place. CRE may also actively encourage the implementation of a programme equivalent to its own in entities with which it has significant business relationships such as joint ventures, partnerships, trading relationships, contractors and agents.

What is the CRE Policy?

It is illegal to offer, promise, give, request, agree to receive or accept a bribe. A bribe is the provision of a financial or non-financial advantage, where the intention is to induce a person to perform a function improperly or to influence a person in their capacity as a public official. The Bribery Act 2010 establishes four key criminal offences:

- Bribing another person - to promise, give, request, agree to receive or accept a bribe (whether directly or through a third party)
- Being bribed to request, receive or agree to receive a bribe
- Bribing a foreign public official
- Failure of an organisation to prevent bribery by an Associated Person.

Employees can be held personally liable for any such criminal offence. CRE can also be liable for a criminal offence where it has failed to prevent such bribery by Associated Persons. As well as an unlimited fine, it could suffer substantial reputational damage. The maximum penalty upon conviction is 10 years' imprisonment.

CRE is committed to the prevention of bribery and to complying with the Bribery Act 2010.

CRE will:

- Ensure that it carries out its business activity, and the business activity of those associated with us, is carried out in such a way to avoid the potential for bribery, fraud or corruption to take place.
- Put in place processes and procedures to ensure it complies with the requirements of the Act.
- Ensure that appropriate risk assessments are carried out to assess the nature and extent of CRE's exposure to bribery.
- Implement a communication and training programme to ensure that all staff are aware of the principles of the Act and that anti-bribery is embedded into the culture of CRE.
- Monitor implementation of the processes and procedures in order to ensure the prevention bribery.
- Co-operate with the relevant regulators and law enforcement offices.
- Investigate incidents of suspected bribery fairly and according to the Act.
- Enforce this Policy and supporting procedures/guidance consistently throughout CRE.
- Handle acts of bribery in line with the CRE Disciplinary Policy and Procedures.

More detailed explanation of the Bribery Act 2010 legislation is contained within the [Anti-Bribery and Corruption Guidance](#).

Who is responsible for implementing this Policy?

All employees and Associated Persons are required to:

- comply with the anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they may be expected to work;
- comply with this Anti-Bribery & Corruption Policy and guidance when working;
- act honestly, responsibly and with integrity at all times; and
- operate in an ethical, professional and lawful manner at all times.

However, the following people have key areas of responsibility:

- **The Board and directors of CRE** are ultimately responsible for ensuring that CRE meets its legal obligations and are responsible for formally approving this Policy and any amendments from time to time. The Board is responsible for:
 - overseeing the implementation of this Policy;
 - considering any instances of bribery that are reported to it & ensuring such instances are dealt with by senior management in accordance with this Policy;
 - reviewing the Gifts and Hospitality Register annually;
 - reviewing the risk assessments undertaken by CRE on bribery and corruption; and
 - assessing the activities undertaken in accordance with this Policy.
- **CRE directors** (for each CRE company) will ensure that their behaviours and actions demonstrate the importance of complying with the Act and preventing bribery practices at work. They will also be responsible for establishing a culture within CRE where bribery and corrupt business practice does not exist and is never acceptable. Directors will ensure that all aspects of this Policy are applied and are responsible for:
 - keeping the Board updated about on the responsibilities, risks and issues;
 - reviewing all bribery and corruption procedures and related policies, in line with an agreed schedule;
 - arranging for bribery training and advice for people covered by this Policy; and
 - handling bribery questions from staff and anyone else covered by this Policy.
- **CRE Managers and Heads of Departments** and those employees with delegated responsibility for team leadership and supervision are responsible for day-to-day implementation of this Policy amongst the teams that are directly managed by them. Managers and Heads of Departments will ensure that the accompanying procedure/guidance documents are complied with at all times. CRE Managers and Heads of Departments will ensure that operational practices and processes do not result in actions amounting to bribery, including those relating to finance, gifts and hospitality, procurement and contract management and should ensure that all matters raised under this Policy are investigated thoroughly.

CRE Managers and Heads of Departments will ensure that due diligence is carried out before entering any business relationships or projects.

- **The Director of HR** is responsible for ensuring that people practices including recruitment, vetting, promotion, training, performance evaluation, remuneration and recognition reflects the CRE commitment to Anti-bribery. The HR team will provide advice and support during the course of investigations and will provide clear, unambiguous policies and procedures. Additionally, HR will implement a programme of tailored training to ensure appropriate induction/orientation training is given to new recruits to raise awareness of the CRE Anti-Bribery programme and after that as and when required as a refresher.
- **CRE employees (including interns and apprentices)** are each responsible at all times for their own conduct, behaviour and ensuring that they work legally and ethically. All staff members should ensure they read, understand and act within the rules set out in this Policy at all times. This includes the rules on gifts, hospitality and promotional expenditure. Employees will report all incidents they genuinely believe to be a breach of the Anti-Bribery Policy that may have or may likely take place to the General Counsel, Director of HR or their line manager. Alternatively, employees may wish to follow the guidance provided in the Whistleblowing Policy.

How do I implement the Policy?

The following guidance documents are available:

- [Anti-Bribery and Corruption Guidance](#);
- [Anti-Bribery report form](#);
- [Gifts and Hospitality Guide](#);
- [Gifts and Hospitality registration form](#); and
- [Gifts and Hospitality Self-check form](#).

Equalities Statement

CRE will strive to take all practical steps to prevent discrimination during the course of the implementation of this Policy above.

We will monitor the conduct of actions taken under the framework of this Policy in order to identify inequalities and formulate plans to address them ensuring Fairness of Treatment at work under the Equalities Act 2010 and the cultural values of CRE.

Where can I find further advice and guidance on this Policy?

For further advice, please contact the General Counsel, the Legal Department³ or the Director of HR (Toby Warren).

³ Legal Department can be contacted by email at legal.assistant@coryenergy.com or you can directly contact: Tess Bridgman (General Counsel), Carrie Allen (Senior Legal Counsel) or Mai Nguyen (Legal Counsel).

Cory Riverside Energy Anti-Bribery & Corruption Policy

2 Coldbath Square. London EC1R 5HL

All rights reserved. Third parties may only reproduce this Policy or parts of it for academic, educational or research purposes or where the prior consent of CRE has been obtained for influencing or developing policy and practice.

VERSION 3 - September 2018

