

INTEGRITY POLICY

ARTICLE 13 LTD

article 13

COMMITMENTS

Article 13 Ltd believes that integrity is central to the ethical performance of its business in all its dealings with clients, suppliers (including associates) and staff.

For Article 13 integrity means that it seeks to:

- manage its own activities so that organisations working with Article 13 can be confident that it meets the ethical supply chain standards set by itself for others;
- work against corruption in all its forms, including extortion and bribery, in accordance with the tenth principle of the United Nations Global Compact.

Article 13 will work against corruption, bribery and extortion defined as follows:

1. *Corruption*: the misuse of entrusted power for private gain.
2. *Bribery*: a form of corruption: the promise, offer, or gift of something of value, especially money, to a person to gain influence or to procure goods, services or other reward beyond what has been legally contracted;
3. *Extortion*: the threat of injury to a person or their property or reputation in order to obtain something of value from them or to induce them to undertake, or not undertake, an action;

STAFF RESPONSIBILITIES

The cooperation of all employees is essential for the success of this policy.

If any employee considers that unethical decisions are being made, they should:

1. raise the complaint with a director verbally;
2. if this is not appropriate or the issues are not resolved, then employees may speak to a non-executive director directly.



MANAGEMENT RESPONSIBILITIES

The Directors are responsible for implementing the Integrity Policy and acting in compliance with all applicable national and international laws and regulations.

Neither Article 13 nor its employees, in the course of their duties for Article 13, shall:

- solicit, or accept money, loans or credit from clients or suppliers, except as provided for by client or supplier contracts;
- accept gifts, entertainment, favours or services from present or potential suppliers which may appear to diminish the objectivity of Article 13's decision-making process.

To ensure that transparency is maintained in reference to our finances, the following process will be followed:

1. Incoming invoices and expenses claims are checked by the Financial Controller. They are then passed to the company directors for approval and are signed by them as confirmation of this approval;
2. Approved invoices and expenses are passed back to the Financial Controller for entering onto the Sage accounting system;
3. At the appropriate time, based on terms of business, invoices and expenses are paid by BACS by the Financial Controller;
4. All paperwork is filed by the Financial Controller and kept securely for seven years after the end of the financial year;
5. At the end of each financial year, the accounts are audited by the company accountants, Diverset Ltd, who ensure that all financial dealings within the past year are in accordance with legislation and ethical practices.

It has become common business practice to purchase food and beverages for business meetings. Beyond this, Article 13 will not accept or make contributions in the form of money, gifts or any other means that may be deemed as a bribe.

Under no circumstances will Article 13 or any of its directors or staff members attempt to extort anything from anyone, be they a client, supplier (including associates) or a staff member.

Article 13 shall not misuse its power or position in any way, shape or form for private gain.

REVIEW

The Integrity Policy will be reviewed annually to determine the need for alteration and revision.

COMMUNICATIONS

A copy of this policy and all subsequent revisions will be brought to the notice of each employee. All new employees will receive a hard or electronic copy and a verbal statement on integrity as part of their induction training.

Staff views and questions relating to integrity are actively encouraged and should be raised with their employee representative, Office Manager or the Directors as appropriate.

Expert advice will be obtained when required from appropriate sources/organisations.

Effective 1st August 2007; reviewed August 2009, October 2010, Updated November 2011

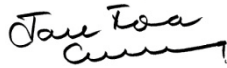


ASSOCIATED DOCUMENTS

- Sustainability Policy
- Supply Chain Policy
- Financial Procedures
- Quality Policy

RELEVANT LEGISLATION AND STANDARDS

- Bribery Act 2010
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions 1999
- United Nations Convention against Corruption



Jane Fiona Cumming

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