



Farminer Developments Limited

Anti-Bribery and Corruption Policy

Farminer Developments Limited is committed to undertaking business in an ethical and professional manner that is fair and honest. Such commitment will be reflected in the daily business of the organisation. Bribery and corruption expose the organisation and its employees to the risk of harming the businesses reputation along with criminal prosecution.

Farminer Developments Limited therefore operates a zero tolerance policy in regards to all forms of bribery and corruption. The company's main board are committed to the communication of such policy throughout all levels of the business. The bribery and corruption policy below sets out the standards expected of all employees. All employees in particular must adhere to all legal standards including the Bribery Act 2010. The policy is also relevant for third parties who perform services for Farminer Developments Limited. The company expects those parties to either adhere to the following policy or to have equivalent policies and procedures in place.

Compliance with the Policy does not discount the opportunity for Farminer Developments Limited to entertain its customers and suppliers so as to get to know them better within the ordinary course of business. However, it does mean that entertainment must be appropriate and relevant. In addition, gifts may be given or received where custom dictates, however, the giving and receiving of gifts or entertainment need be done without the intention of the recipient being improperly influenced by the provider.

The Policy

The business prohibits the offer, gift or acceptance of a bribe in any form. Such bribes include the incorporation of kickbacks on a contract payment, facilitation payments or the provision of improper benefits to customers, agents, suppliers, contractors or employees. We also prohibit any employees from accepting any bribes, facilitation payments or kickbacks from customers, agents, suppliers, contractors or employees for their own or acquaintance benefits. The policy therefore consists of two clear rules for employees to adhere; firstly: *Do not offer, promise or pay bribes* and secondly: *Do not demand, agree or accept bribes*.

Farminer Developments Limited 8 Point Plan against Bribery and Corruption

Farminer Developments Limited has adopted an 8 point plan to combat bribery and corruption:

1. The **commitment from the Main Board and Senior Directors** to the businesses internal controls, compliance programmes and measures for preventing and identifying bribery and corruption.
2. **Senior Directors** are required to oversee the implementation and development of this policy.



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3. The **establishment of a visible corporate policy** to ensure the businesses principles prohibiting bribery and corruption are installed at all levels while sound business and ethical practices are embedded into the companies' daily business.
4. The **requirement that our employees read and comply** with this anti-bribery and corruption policy.
5. **Training** of all employees within Farminer Developments Limited to recognise bribery and corruption and comply with all the businesses policies and procedures.
6. The use of **financial and accounting procedures** designed to ensure the maintenance of fair and accurate books, records and accounts that cannot be used to hide bribery and corruption.
7. Development and implementation of **appropriate disciplinary sanctions** for violations of our policies and procedures against bribery and corruption.
8. **Annual reviews** of the Farminer Developments Limited anti-bribery and corruption policies and procedures.

This policy has been formally adopted by the directors of Farminer Developments Limited who are committed to preventing bribery and corruption. The aim of this policy is to establish a culture within the company whereby bribery and corruption are not acceptable. It is the responsibility of the directors to ensure the development and implementation of the company's anti-bribery and corruption policy to ensure its implementation to employees and business partners.