The purpose of this policy is to state HSEC Service's position on bribery and corruption matters and also to provide information and guidance on recognising and dealing with bribery and corruption should it occur.

This policy applies to all employees including those on either temporary or fixed term contracts, agents, consultants, business partners and any person or organisation who perform services for or on behalf of HSEC Services in any location throughout the world.

As laid out in the HSEC Services Code of Business Ethics, integrity is a key HSEC Services value. It is our expectation that our people maintain the highest standards of ethics in all HSEC Services associated business dealings worldwide.

HSEC Services is committed to conducting itself fairly, honestly and lawfully in all its business dealings and relationships globally.

We have a zero tolerance approach to corruption and are committed to upholding all laws relevant to countering bribery and corruption in all the jurisdictions within which we operate (a bribe is an inducement or reward offered, promised or provided in order to bring about the improper performance by another person of a relevant function or activity).

The HSEC Services Managing Director has approved and issued this policy as part of the companies overall responsibility for ensuring compliance with legal and ethical obligations and that all those under HSEC Service's control comply with it.

Our zero tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

The HSEC Services Managing Director will provide key clients with a dedicated communication channel so that any potential breaches of our Anti Bribery and Corruption Policy requirements can be addressed quickly and effectively.

Keith Griffin Managing Director HSEC Services 18 November 2014

