

Ethical Business Commitment	FHB-COR-00007 Rev 0 (E)	Effective: 28th May 2013
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Bertling Logistics Anti-Bribery and Corruption Policy Statement

Bertling in its almost 150 year history has and continues to be committed to applying the highest standards of ethical conduct and integrity in its business activities wherever it does business. Every employee and individual or organisation acting on Bertling's behalf is responsible for conducting Bertling's business honestly and professionally.

Bertling considers that bribery and corruption has a detrimental impact on business. We aim to carry out business in a transparent and ethical way and by helping to ensure that there is honest, open and fair competition in the sectors where we do business.

Bertling does not tolerate any form of bribery by, or of, its employees or any persons or companies acting for it or on its behalf. The Shareholders, Board and senior management are committed to implementing and enforcing effective systems to prevent, monitor and eliminate bribery, in accordance with the UK Bribery Act (2010) and the United States Foreign Corrupt Practices Act (1977) amongst others.

Bertling has issued its Values and Code of Conduct which sets down the ethical behaviour expected of every employee and individuals or organisations acting on Bertling's behalf. All employees and those individual or organisation acting on Bertling's behalf are required to familiarise themselves and comply with this Values and Code of Conduct statement.

Bribery is defined as offering, paying, promising or giving, directly or indirectly, anything of value to another company's agent, representative, intermediary or employee, with the intent to influence the recipient's action in relation to that company's affairs or business. This includes facilitation or grease payments or any other unofficial payments for routine governmental action


Employees and others acting for or on behalf of Bertling are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments. As part of our anti-bribery policies, Bertling is committed to only offer and receive transparent, proportionate, reasonable and legitimate hospitality, gifts and promotional expenditure or charitable giving.

A breach of this ethical behaviour policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct and immediate dismissal.

Employees and other individuals acting for Bertling should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for Bertling.

Bertling will not conduct business with service providers, agents or sub-contractors or representatives that do not support and commit to follow Bertling's anti-bribery and corruption objectives.

The success of Bertling's anti-bribery measures depends on everyone playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of, Bertling are encouraged to report any suspicious activity by calling the Bertling Compliance Helpline on: **+1 704-552-8684** or by visiting: <http://bertling.alertline.com> All concerns raised in good faith will be taken seriously and handled in line with Bertling's investigations procedure

Signed:	Name & Title:	Date:
	Matthias Oehmicke Chief Executive Officer	15 April 2015