

## Anti-corruption Policy

1. For the purposes of this code, "corruption" includes bribery, extortion, fraud, deception, collusion, cartels, abuse of power, embezzlement, trading in influence, money laundering, and similar criminal activity.
2. Corruption causes poverty and suffering, inhibits economic growth, is damaging to business, and may result in criminal and civil liability and penalties for organisations and individuals.
3. SYMPHONY ENVIRONMENTAL TECHNOLOGIES PLC prohibits its officers and employees, and its Distributors and those related companies which it controls, from engaging in any form of corruption in relation to Symphony's business and affairs.
4. SYMPHONY ENVIRONMENTAL TECHNOLOGIES PLC will use all reasonable endeavors to conduct its business and affairs so as to ensure that it does not engage in or facilitate any form of corruption.
5. In order to minimise opportunity for corruption, SYMPHONY ENVIRONMENTAL TECHNOLOGIES PLC does not, without the express approval of the Board, make any political or charitable donations nor provide gifts or hospitality of an aggregate value exceeding £5,000 to any one person or organisation in any period of 12 months. It also prohibits the receipt by SYMPHONY ENVIRONMENTAL TECHNOLOGIES PLC and each of its officers or employees of any donations or gifts or hospitality exceeding £500 except as declared to and authorised by the Board.
6. The de minimis amounts specified in clause 5 are for Symphony in the UK. Distributors should themselves set suitable amounts having regard to conditions in their own country.
7. A facilitation payment is a payment made to encourage a person to carry out his duty. Even though facilitation payments are in many cases obtained by way of extortion, they are nevertheless a form of corruption and the making or receiving of a facilitation payment is a criminal offence in many jurisdictions. SYMPHONY ENVIRONMENTAL TECHNOLOGIES PLC prohibits the making of any facilitation payment save in circumstances where the personal safety of any person is endangered.
8. Any such facilitation payment, and any suspicion of corruption must be reported forthwith to the Finance Director.
9. Anti-corruption action by individual organisations is not sufficient to reduce corruption to any significant extent. There must, in addition, be concentrated and collaborative action by all stakeholders. SYMPHONY ENVIRONMENTAL TECHNOLOGIES PLC supports international efforts and works with other stakeholders to reduce corruption. (Anti-Corruption Code adopted by Board Resolution dated 10th December 2010)

