

Anti-Corruption and Bribery Policy Statement

Corruption or Bribery has no place in the business activities of St Ives Group of companies (“the Group”) and the board is committed to maintain its reputation by preventing bribery by persons associated with the Group.

The board’s aim is to foster a culture within the Group in which bribery is never acceptable. Any practice which involves an act of bribery shall de facto be treated as a serious disciplinary offence, in the event of a Group employee being involved. In the event of an agent or third party contractor being involved, all association with the agent or third party contractor may be terminated and, where appropriate, legal action taken to protect the Group’s interests.

The board is committed to setting procedures for managing the potential risks of its employees, agents and others who perform services for the Group (“associated persons”) offering, promising or giving a bribe to another person in order to gain an advantage for the Group and thereby causing a criminal offence to be committed by the Group, under the Bribery Act 2010 (the Act).

The procedures are designed to minimise such risks to the Group.

The Group’s approach to these risks is based upon the assessment of risk, and the implementation of controls to manage these risks. This approach is based on the six principles set out in the UK Ministry of Justice Guidance and other relevant guidance documents.

All employees shall be given access to guidelines to make them aware of the areas in which their activities, or lack of activity, might expose them as individuals, or the Group, to criminal penalties under the Act; to set out responsibilities for upholding the Group’s position on bribery and corruption; to help them recognise and deal with bribery and corruption issues should they arise at any time; and to help them raise concerns and report any malpractice.

The Group’s board and management are fully committed to supporting the implementation of this policy.

For, and on behalf of, the board

Patrick Martell
Chief Executive
July 2011