



Hurricane

Anti-Bribery and Corruption Policy

HUR-BMS-LEG-POL-0002-0

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0. Signature Sheet

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Date: 8 April 2019

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1. Introduction

1.1 Policy statement

High standards of ethical behaviour and compliance with laws and regulations are essential to protecting the reputation and long-term success of our business. It is our policy to conduct all of our business in an honest and ethical manner. We recognise the harm to local communities caused by bribery and corruption and we are committed to working with our staff and business partners to prevent bribery and corruption.

We uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by UK laws, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

1.2 Objectives of this ABC Policy

This Anti-Bribery and Corruption (ABC) Policy sets out Hurricane's position on any form of bribery and corruption. Our reputation for maintaining lawful business practices is of paramount importance to us and this ABC Policy (together with our internal Anti-Bribery and Corruption Procedures and Guidance -document number HUR-BMS-LEG-PRO-0001) is designed to preserve these values. The objectives of this ABC Policy are to:

- affirm our commitment to stamping out bribery and corruption wherever possible by addressing those areas of highest risk of bribery to us;
- ensure through our systems and processes that we do not pay bribes and try to prevent our business partners and others from paying bribes wherever possible;
- explain how our employees, business partners and agents can, in practice, prevent and avoid bribery and corruption;
- provide information and guidance to those working for and with us on how to recognise and deal with bribery and corruption issues;
- protect Hurricane and our people from prosecution and investigation for bribery offences, which carry very serious criminal penalties and reputational risk.

1.3 Who must comply with this ABC Policy?

This ABC Policy applies to:

- all directors of Hurricane and any of its group companies;
- all employees and third party individuals working within or for the Hurricane organisation;
- all relevant third parties

An **employee** includes employees (whether permanent, fixed term or temporary) at all levels working for Hurricane or any of its group companies, and includes officers, seconded workers, casual workers, trainees, volunteers, and interns.

A **third party** could be any agent, distributor, consultant, contractor, co-venturer, joint venture partner, business partner, vendor, political party, government or public body, including their personnel, advisors and representatives, which conducts activities for or on behalf of Hurricane or is associated with Hurricane or any of its group companies.



A **relevant third party** is a third party that is authorised by Hurricane or any of its group companies to carry out activities on behalf of Hurricane or any of its group companies in a representative capacity but does not include third party individuals.

Third party individuals include individuals employed by a third party and who work within the Hurricane organisation such as independent contractors, agency and seconded workers.

All directors, employees, third party individuals and relevant third parties are required to certify that they have read and understood this ABC Policy and shall be responsible for compliance with this ABC Policy (and our ABC Procedure Procedures and Guidance) and to prevent, detect and report any suspected bribery or corruption.

1.4 Who is responsible for this ABC Policy?

The board of directors of Hurricane has overall responsibility for ensuring that this ABC Policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Compliance Manager has primary and day-to-day responsibility for implementing the ABC Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering bribery and corruption.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this ABC Policy and are given adequate and regular training on it. Managers must also maintain and promote a positive compliance culture where bribery and corruption is not tolerated and is reported wherever it is suspected.



2. Guiding Business Principles

This ABC Policy is designed to help Hurricane in maintaining a proportionate position in complying with the relevant laws wherever we operate – in particular the bribery and corruption laws of the United Kingdom. These laws require that Hurricane is responsible for implementing ABC risk management procedures across our business. Hurricane adopts a risk-based approach informed by a number of guiding Principles to manage bribery and corruption risks.

We have devised a programme of initiatives to counter bribery and corruption risks (the ABC Programme) – this ABC Programme is the backbone of this ABC Policy and our commitment to ensuring that we operate our business free of bribery and corruption. Our guiding Principles are designed to mitigate risks to our brand and reputation and reduce chances of bribery and corruption in our organisation.

We adopt a zero-tolerance approach to bribery and corruption. We acknowledge that any incidents of bribery and corruption involving, or relating to, Hurricane will damage our reputation and is ethically harmful. As such we expect all employees and those who work with or for us have a personal responsibility for protecting our reputation and living up to our guiding Principles.

The following guiding Principles underpin our ABC Programme:

Our Principles	
1.	We expect the highest standards of integrity and professionalism from our staff
2.	We expect those with whom we do business to abide by our ABC Policy at all times
3.	We do not offer or accept inappropriate gifts or hospitality
4.	We recognise that facilitation payments are bribes and do not pay them
5.	We maintain effective internal controls to counter bribery

Our Principles are supported by a robust ABC Programme which provides a framework within which we conduct our business. Our framework is addressed in our internal ABC Procedures and Guidance and focusses on key risk areas:

2.1 Third party due diligence

Hurricane ensures that all third parties with whom it deals are properly vetted to mitigate the risk of bribery and corruption.

2.2 Communication and training

Hurricane's zero-tolerance approach to bribery and corruption is communicated both internally to all directors and employees and externally to third parties.

Hurricane provides mandatory training to all directors, employees and any third party individuals who work within the Hurricane organisation to reinforce their knowledge, understanding and implementation of the ABC Policy and our ABC Programme.



2.3 Contract tendering

Hurricane ensures that all contracts awarded by it are done so lawfully without connection to bribery and corruption.

2.4 Employment procedures

Hurricane expects the highest standards of integrity and professionalism and compliance with this ABC Policy from all prospective and existing directors, employees and any third party individuals who work within the Hurricane organisation.

2.5 Gifts, hospitality, facilitation payments and donations

Hurricane recognises the giving and receiving of gifts, entertainment and hospitality as part of normal business relations, provided such activity is reasonable, transparent, proportionate and properly recorded, and is not intended to influence or could be perceived as influencing business decisions or transactions.

Hurricane prohibits facilitation payments and is committed to combating the facilitation payment culture wherever it is encountered.

Hurricane prohibits all, and prohibits its directors, employees and any third party individuals who work within the Hurricane organisation from making directly or indirectly, charitable or political contributions of any kind in Hurricane's name or using Hurricane's resources for such purpose.

2.6 Hosting of external parties

Hurricane recognises that visits from external parties, including investors, analysts and government officials, to its sites are a necessary part of its business. Where such visits are paid for by Hurricane, they must be properly arranged, controlled and recorded to avoid any perception of undue influence.

2.7 Money laundering and cash transactions

Hurricane ensures that commercial transactions involving cash are kept to a minimum and only when properly authorised to protect our assets against fraud or misuse.

2.8 Investigating, sanctions for breach and reporting

Hurricane will investigate promptly and in confidence any factual or suspected instance of bribery or corruption related to any transaction that involves Hurricane and/or any directors, employees or any third parties who work within the Hurricane organisation of which we become aware, and will take appropriate disciplinary action against any individuals found to be involved in bribery or corruption including dismissal or suspension or termination of any relevant contract, sub-contract or other agreement with an associated person.

2.9 Monitoring and review

Hurricane maintains accurate records and documentation to demonstrate the effectiveness of its compliance programme and monitor the implementation of the ABC Policy and its ABC Programme.