

NICC STANDARDS LTD

ANTI-CORRUPTION AND BRIBERY POLICY

I. APPLICATION OF THE POLICY

It is the policy of NICC Standards Ltd (“NICC”) to maintain the highest level of ethical standards in the conduct of its business affairs. NICC has a zero-tolerance approach to bribery. The actions and conduct of NICC Directors, working group chairmen and working group participants (collectively, “NICC participants”), as well as others acting on NICC’s behalf, are essential to maintaining these ethical standards. To that end, all NICC participants must read, become familiar and comply with this Anti-Corruption and Bribery Policy, as well as future updates and other similar materials issued from time to time.

II. COMPLIANCE WITH ANTI-BRIBERY LAWS

The United Kingdom, the United States and many other countries have adopted and enforce laws prohibiting the payment of bribes for the purpose of obtaining or retaining business opportunities in both the public and private sector. To ensure that financial transactions and other activities undertaken on behalf of NICC do not violate these anti-bribery laws, NICC participants must review and understand this Policy.

NICC has a zero tolerance of bribery. The offering, making, soliciting or acceptance of corrupt or illicit payments or gifts, kickbacks or facilitation payments to any person or entity is strictly prohibited.

In order for transactions and activities of NICC participants to comply with the law:

A. *General NICC participant responsibilities*

1. NICC participants must conduct NICC business in compliance with the highest professional and ethical standards and in accordance with all applicable legal requirements.
2. NICC participants may not, either directly or indirectly, give, or agree to give, offer or receive, any money, gift or thing of value to or from any person or party or any representative thereof, as an inducement or reward for favourable action or forbearance from action or the exercise of influence. For the purposes of this Policy, a “representative” includes any person employed by or acting for another, and “party” includes an employer.
3. In conducting business, NICC participants must be aware of and employ special scrutiny in “red flag” situations that create greater risk of non-compliance. In these situations, NICC participants must seek guidance from the NICC Board.
4. All NICC participants must report any suspected or actual (whether or not based on personal knowledge) instances of non-compliance with this Policy and must provide all pertinent information to assist in any internal investigation. Reports should be made to an NICC Director. Alternatively, you can make an anonymous report via your company’s helpline (if available).
5. Under no circumstances will the reporting of a possible impropriety serve as a basis for retaliatory actions against any NICC participant.

B. NICC Director responsibilities

1. The use of company funds for any unlawful, improper or unethical purpose is prohibited. NICC directors may not authorize, promise or give an advantage, tolerate, encourage or make any Prohibited Payments (described below), regardless of amount. This prohibition also applies to indirect contributions, payments or gifts made in any manner, such as through consultants, contractors, sub-contractors, agents, sub-agents, sponsors or sub-sponsors, joint venture partners, advisors, customers, suppliers or other third parties. For purposes of this Policy:
 - “Prohibited Payments” includes any offer, gift or payment, or authorisation of an offer, gift or payment, of any money or thing of value to or for the benefit of any person or party, for the purpose of obtaining or maintaining NICC business. Facilitating payments or “grease payments”, i.e. payments to expedite the performance of routine governmental actions, are prohibited.
2. No payment by NICC to any party or its representative may be made in cash. All payments must be by wire transfer or cheque to a bank account in such party’s or representative’s name in the country where the party or representative regularly delivers service for NICC.
3. All NICC directors and contractors are reminded that:
 - All corporate records for which NICC directors are responsible must accurately reflect and be a fair presentation of the activities they record and reflect the nature and purpose of the activity. No false or inaccurate entries will be made in NICC’s records for any reason.
 - Before proceeding with any contract or other arrangement on behalf of NICC with a prospective agent or consultant, representative or joint venture partner, NICC directors must obtain the approval of the NICC Board to the terms of the contract or arrangement.

For further guidance on this policy, please contact secretary@niccstandards.org.uk.