
Global Anti-Bribery & Corruption Policy Statement

Black & White Engineering is a global consulting engineering business specialising in data centre and mission critical market.

Black & White is committed to conducting business with a high level of integrity and within the law wherever the business operates and with whomever it may deal with. When Black & White is clearly seen to behave in an ethical manner, it enhances its own reputation for integrity, which in turn helps it to attract and retain both customers and employees. Corrupt acts expose Black & White and its employees to the risk of prosecution, fines, debarments from tendering for business and other penalties, as well as damaging the company's reputation and increasing the cost of doing business. Individuals may also be imprisoned. As such, Black & White does not tolerate any form of corruption or bribery in any of our dealings.

We must not, and we must ensure that any third party acting on our behalf does not, act corruptly in our dealings with any other person.

The purpose of this policy is to set out our zero-tolerance position on bribery and corruption. Black & White attaches the utmost importance to this policy. It has been unanimously approved by the Board and all our employees and business partners worldwide are expected and required to comply with it, irrespective of where they operate and regardless of local norms and practices.

This policy and procedures set out are communicated to the entire organisation through rigorous training. In addition, the Employee Handbook has a clause dedicated to company moral standards on bribery and corruption.

All Black & White employees must adhere to these particularly as it forms part of their contract with Black & White. Violation of this policy is ground for disciplinary action, which may result in immediate dismissal and for clients, the immediate termination of contracts.

What is Bribery?

Bribery can be defined by offering, receiving, or soliciting an item of value with the intention of influencing the action or decisions of the recipient.

What is Corruption?

Corruption is defined as misuse of power for a private gain, typically, but not exclusively, involving bribery, but can also involve:

- facilitating the evasion of tax evasion;
- contravening sanctions' laws; and
- breaching money laundering laws

Gifts, Entertainment, Hospitality

All Black & White staff **must not** participate or become involved in any activities conflicting with this policy. Any given or received gifts or entertainment must be recorded in company Gifts & Hospitality Register and approved by a director.

Concerns & Guidance

The Board is committed to implementing this policy within the organisation. Any person wishing to raise a concern in good faith can make contact confidentially directly with the directors, without fear or concern of reprisal or being penalised in any way.


Penalties

Breach of this policy will result in disciplinary action. Internally for Black & White, this could include termination of employment. Externally, this could result in prosecutions by a public prosecutor, that could lead to financial penalties and/or imprisonment. Any fines imposed on individuals will not be paid by Black & White.



MICK CAIRNS, CEO,
Global Policy Leader

REVISIONS

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