

Zero Tolerance Bribery and Corruption Policy

Hydro Group plc is committed to applying the highest standards of ethical conduct and integrity in its business activities. Hydro Group plc considers bribery and corruption to be detrimental and believes in carrying out Business in a transparent and ethical way, ensuring that there is honest, open and fair competition in our sectors.

This Zero Tolerance Policy applies to all individuals working within Hydro Group plc at all levels, including Directors, Employees, Visitors and Contractors. Compliance with this Policy is mandatory.

The purpose of the Policy is to set out the minimum requirements and procedural steps that all employees must follow in order comply with this Policy.

- Bribe – the giving, offering or promising, directly or indirectly, of a financial or other advantage with the intent to induce another person to improperly perform a function or activity.
- Corruption – dishonest or fraudulent conduct by those in power

Employees must:

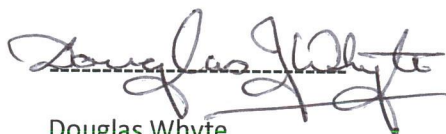
- Not give, offer, request or accept, directly or indirectly, anything that either is or could reasonably be viewed to be a bribe
- Familiarise yourself with the ABC Policy and act in accordance with it
- Report as soon as possible to HR if you know or suspect of a breach of the ABC Policy by you or another person

The Board and Senior Management must ensure:

- All employees are aware of ABC Policy
- All employees receive regular updates from Team Leaders/Management in relation to ABC Policy
- Sufficient resources, personnel, appropriate systems and reporting requirements are implemented
- Any non-compliance with the ABC Policy is dealt with in an appropriate and timely manner

The Board of Directors and Senior Management are committed to implementing and enforcing effective systems to prevent, monitor and eliminate bribery and corruption, in accordance with the Bribery Act 2010.

Signed:



Douglas Whyte
Managing Director
Hydro Group plc

Date:

3/12/19