



THE PREMIER GROUP (ISLE OF MAN) LIMITED

The Premier Group (Isle of Man) Limited

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**Anti-Bribery and Corruption Statement made by the Board of
The Premier Group (Isle of Man) Limited
(The “Company”)**

Bribery is defined as the offer or promise of giving a financial advantage in order to bring about improper performance. Bribery reduces the principle of free and fair competition which stands diminished by each bribe offered or accepted.

Corruption causes poverty and suffering, inhibits economic growth and is damaging to business. Both bribery and corruption may result in criminal and civil liability and penalties for organisations and individuals.

The Company is committed to carrying out its business in a fair, open and honest manner. It is fully prepared to comply with the requirements of the Bribery Act 2010 of the United Kingdom and in doing so has procedures in place which clearly define how compliance is achieved along with the consequences of non-compliance.

The Company:

- Prohibits its officers and employees, and those related companies which it controls, from engaging in any form of bribery in relation to the Company's business and affairs.
- Will use all reasonable endeavours to conduct its business and affairs so as to ensure that it does not engage in or facilitate any form of bribery.
- States that all donations, gifts and hospitality over the value of £50 provided or received by the Company or its officers or employees must be recorded in a gifts register which is reported to the Board at least quarterly.

Facilitation payments are small bribes to facilitate routine Government action which have over time become expected or a business norm in some areas. It is noted in the Bribery Act 2010 that these types of payment will not be permitted. A facilitation payment could trigger either a Section 6 and/or Section 1 offence and therefore potential liability under Section 7 of the Act.

The Company prohibits the making of any facilitation payment, save in circumstances where the personal safety of any person is endangered.

The Company has adopted corporate anti-bribery procedures to enable it to comply with this Code.

The Company will properly implement this programme and review it periodically to ensure that it is operating effectively.