



## ANTI-BRIBERY STATEMENT

Surfachem is committed to carrying out its business fairly, honestly, openly and with integrity in all of its dealings. It has in place an anti-bribery policy document which outlines the Surfachem Group position to ensure compliance with anti-bribery laws, rules and regulations, not just in the UK but in any other country in which the Company carries out its business.

The policy enables employees and persons associated with the Company to understand the risks associated with bribery and encourages employees to be vigilant and effectively recognise, prevent and report any wrong doing, whether by themselves or others. Breaching this law has serious implications – unlimited fines, potential prison sentences for individuals and of course real damage to a company's reputation. To assist, Surfachem have put in place a Compliance Team who will be able to advise on the Bribery Act and company compliance.

The policy covers key areas such as- Purpose and Scope, Bribery Offences, What is a bribe?, Steps taken to ensure Compliance, Employee and Management Commitment, International Dealings, Distributorships/Supplier Contracts, Corporate Hospitality and Corporate Gifts , Supplier Relationship, Hospitality and Gifts , Reporting Procedure, Monitoring Compliance, Training.

Surfachem's top management fully support the policy and it is applicable to all employees and operations carried out in the UK and abroad. It also applies to any anyone associated with the Company or who performs functions in relation to or for and behalf of the company, including, but not limited to, directors, agency workers, contractors, consultants, suppliers.

Surfachem is aware that it will be liable to prosecution if any persons associated with bribes is intending to obtain or retain business or an advantage in the conduct of business for that organisation. It will therefore have full transparency of transactions and disclosure of information.

Surfachem has a zero tolerance approach to bribery and corruption and will take disciplinary action against any employee for any actual or intended breaches to the policy.

A handwritten signature in black ink, appearing to read "RJASmith".

.....  
**DR RICHARD SMITH  
MANAGING DIRECTOR**