

# Anti-Bribery Policy

Geotechnical Observations (“The Company”) is committed to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate.

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us.

Under UK law, there is a general offence of bribery, and of bribing a foreign official. Bribery is defined as giving someone a financial or other advantage to induce them to perform their functions or activities improperly, or to reward them for having already done so.

In addition, there is an offence relating to failure by a business to prevent a person associated with it from committing the above offences on its behalf in order to win business, keep business or gain a business advantage for the organisation.

This policy does not prohibit giving and receiving of promotional gifts or genuine business hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must consult a Senior Manager with respect to gifts and hospitality. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage. We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties. The reason for all expense claims relating to hospitality, gifts or expenses incurred to third parties must be recorded.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

This policy will be communicated to all employees through an induction. It will also be prominently displayed at the Company’s office and freely available on the Company intranet.

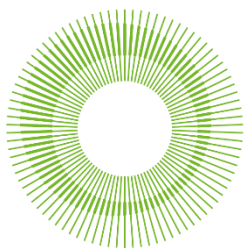
Signed:



(Managing Director)

Date: 24 October 2019

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Trusted Monitoring Solutions

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