

Anti-Bribery Policy

Statement of General Policy

Sundial is committed to all the principles laid down in the Bribery Act. Any instances of an employee offering, promising or giving of a bribe (active bribery) or requesting, agreeing to receive, or the accepting of a bribe (passive bribery); will be treated most seriously and if found to be substantiated, would usually result in dismissal on the grounds of gross misconduct.

It is also a criminal offence to give, promise or offer a bribe, agree to receive or accept a bribe either at home or abroad. Therefore criminal proceedings could also result, resulting in a maximum penalty for bribery of up to ten years imprisonment with an unlimited fine.

Proportionality

Sundial will instigate preventative measures that are proportionate to the size of the organisation and the type and size of our customers and suppliers. The vast majority of Sundial's client and supplier base is UK based and the UK has a high "trust index" compared to many other countries. Also the size of the contracts being offered and placed are relatively small and the hospitality industry is not known for high levels of bribery and corruption.

That said, Sundial will take this policy seriously and regularly review its proportionality as and when the nature or the size of the business changes dramatically.

Top Level Commitment

Sundial will not tolerate any form of bribery or corruption within its organisation or any of its activities. The entire board of Directors and all Managers are wholeheartedly committed to ensuring this policy is adhered to at every level within the organisation and if they ever have any concerns regarding bribery, no matter how small, it shall be given the full attention of the Board of Directors and investigated promptly and rigorously.

Risk Assessment

Sundial considers the risk of bribery or corruption occurring within its organisation is relatively low due to the geography of the business, the markets in which we operate, the types of customers and suppliers and the quality of our staff.

The level of risk will be reviewed annually when the staff handbook is updated to determine if the risk has changed and the policy is still proportionate.

Due Diligence

When recruiting new employees Sundial will take care to take up references as appropriate.

When appointing third parties who represent Sundial's service offering, great care will be taken to check their level of professionalism, if appropriate professional references obtain and possibly request a copy of their own bribery policy to maintain on file.

Communication

This policy will be communicated to all employees via the staff handbook and will be re-iterated during staff inductions, training and the staff newsletter as appropriate.

The policy will also be sent to all suppliers, who have an annual supply contract to Sundial in excess of £50,000.

The policy will be included in any tender to any customer for a contract that exceeds £50,000 in any single contract or an annual spend that exceeds £50,000.

Monitoring and Review

The Board of Directors shall continue to monitor and review this policy. Should any event of bribery, market change or significant other operational changes occur; the policy will be reviewed to assess its effectiveness.

Sundial Group Ltd is registered in the UK no: 3432674 and its registered office is Highgate House, Creaton, Northampton, NN6 8NN
This policy also applies to Sundial Group's subsidiary companies.

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Further information may be obtained by calling +44 (0)1604 731731, emailing info@sundialgroup.com or visiting www.sundialgroup.com