

Ethics Policy

Introduction

Bribery and corruption is unfortunately a feature of corporate and public life in many countries across the world. It is our policy 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.

Scope

This policy applies to all StS Employees whether permanent or temporary.

Policy

StS does not engage in bribery or any form of unethical inducement or payment including facilitation payments and kickbacks. All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business for the company. Employees must declare and keep record of hospitality or gifts accepted or offered, which will be subject to managerial review. We do not make direct or indirect contributions to political parties.

Responsibilities

StS' Managing Director is responsible for implementing this policy and reporting annually to StS' Board of Directors, the MD will establish appropriate procedures and in any instance of corruption will take remedial steps immediately.

Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with the StS Ethics policy in respect of 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.

Signed:



Date:

25/4/14

P. Hancock
Managing Director