



Air Conditioning Experts



## AMP Air Conditioning Anti Bribery and Corruption Statement

AMP Air Conditioning ("AMP") a Panasonic company, is committed to ensuring it meets its legal obligations, prevents, detects and eliminates corrupt practices, and cooperates to reduce opportunities for bribery and corruption.

AMP does not tolerate any form of corruption (including giving and receiving of bribes) within the organisation and takes the most serious view of any attempt to commit corrupt practices by members of staff, contractors, agents and business partners. Cases of suspected bribery will be properly investigated and appropriate action taken, including reporting to appropriate authorities, disciplinary action, prosecution and active pursuit of recovery.

Anti-bribery and corruption is communicated to everyone in the business to ensure their commitment. The senior management will apply a "zero tolerance" approach to acts of bribery and corruption by any employee or business partners working on our behalf.

### What is bribery and corruption?

#### Bribery:

Includes but not limited to, the promising, granting, the requesting or receiving of benefits in money or money's worth to a person with the aim of influencing that person in order to obtain business improperly or gain an improper advantage.

#### Corruption:

The misuse of public office or power for private gain or in relation to business outside the realm of government.

AMP follow a policy on anti-bribery and corruption and this is not intended to prohibit hospitality practices which are proportionate, properly recorded and lawful in the jurisdiction where they are carried out.

Practices that are aimed at establishing / strengthening relationships with suppliers and customers and promoting AMP products and services, must be carried out in moderation, be transparent and not place any expectation on the recipient to reciprocate either by performing, or failing to perform, any other task in return. AMP makes no distinction between facilitation payments (small payments, sometimes known as "grease" payments) and bribes. Both are expressly prohibited, even if the payment is small or totally acceptable according to local custom and tradition.

### Employee responsibility

Each person within the organisation has a duty to speak out against suspected acts of bribery or corrupt practices. Everyone has a responsibility to help prevent, detect and report instances of suspected bribery and wrong doing.

AMP believes it is essential to create an environment in which everyone feels that they can raise any matters of genuine concern without fear of disciplinary action being taken against them or fear of reprisal. We ensure that all cases of bribery are dealt with consistently and whether or not an investigation shows bribery exists, there will be no retaliation against or adverse consequences for the person reporting the possible case of bribery. Further, no employee will suffer any retaliation or adverse consequences for refusing to pay a bribe.

We have a number of channels that employees can go through in order to speak to someone about any concerns in confidence:

- » Whistleblowing hotline
- » Line managers
- » HR managers
- » Legal managers
- » Local finance directors