



GLASS DESIGNS

GLASS AND MIRROR SUPPLIERS TO THE TRADE
TOUGHENED GLASS DIRECT

UNITS 3 & 4, CITY CROSS BUSINESS PARK,
SALUTATION ROAD, GREENWICH, LONDON, SE10 0AT

Anti-Bribery and Corruption Policy

Introduction

Integrity is central to Glass Designs Ltd wherever we do business. One of our core values is to lead by example because we want to do the right thing and we want to be known for doing the right thing. Only by protecting our reputation will we achieve our vision of being "the company of first choice for all stakeholders".

We regard laws and regulations as our minimum standards of integrity which we constantly strive to exceed. In many of the jurisdictions in which we operate, it is a criminal offence to offer, promise or provide- or request or accept - a bribe. Under laws applicable to our operations, it is also an offence for a commercial organization to fail to prevent an incident of bribery being committed either by the company or by someone associated with it in order to obtain or retain a business advantage.

This means that bribery and corruption have absolutely no place at Glass Designs Ltd. We operate a strict zero tolerance policy towards bribery in all its forms whether directly or through third parties.

This anti-bribery and corruption policy is designed to protect you by helping you to understand the legislation relevant to bribery and corruption as much as it is to protect the company's reputation, and applies to all members of Glass Designs Ltd- full and part-time employees and temporary staff wherever we are based. We also rely on the services of contractors, sub-contractors, consultants, agents and intermediaries, and here we want

To do business only with those who accept the terms of our policy or whose own policy

Sets standards to match our own.

This policy builds on the guiding principles set out in our Global Code of Conduct with regard to Anti-Bribery and Corruption and explains what is expected of all Glass Designs Ltd personnel and associated persons. We want you to act according to the spirit and the values they represent in whatever you do for Glass Designs Ltd.

In this way we can achieve our vision together and help drive up standards throughout the industry.

Throughout this policy, references to "us", "our" or "we" are references to Glass Designs Ltd Group.

Our guiding principle

We do not offer or accept bribes or facilitation payments or engage in any form of corruption,

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web: www.glass-design.net

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Whether directly or through any third party.

Understanding and recognising bribery and corruption

Bribery and corruption can occur in many forms; so understanding them and recognizing when they might occur is a key step in guarding against them.

Bribery is when a person offers, gives, receives or solicits a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act improperly.

Corruption is any form of illegal, dishonest or bad behavior, especially by people in positions of power. This can include blackmail (when someone coerces another into doing something by threatening to reveal information) and extortion (the taking of money or property by threatening harm).

In our industry, bribery could occur in situations such as tendering, appointing preferred suppliers, contractors and agents, the award of licenses and so on. Bribery and corruption could occur at all levels within governments and commercial organizations.

Wherever we work in the world – even where bribery may be seen as the norm - we must be clear that we will not participate in or condone any form of bribery in our dealings with the public or private sectors.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a business decision.

Transparency and openness are effective weapons against bribery, so be ready to challenge any arrangements that compromise them. Even political contributions, charitable donations and sponsorship arrangements can be used as a form of bribery.

What are the risks?

As befits a serious criminal offence, the penalties for engaging in bribery or corruption are severe. Individuals and companies can face fines and even imprisonment.

In the UK, there is a specific criminal offence of a company failing to prevent bribery committed on its behalf, which applies wherever the company operates around the world. We take this responsibility very seriously and this is why we want to be associated only with others whose standards match our own.

A conviction for a bribery or corruption related offence would be severely damaging for our reputation. This could lead to us being excluded from tender lists or overlooked when bidding resulting in a loss of work and a decrease in investor confidence, all of which could have severe financial consequences for our business.

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Preventing bribery

Our 'zero tolerance' of bribery relies on each one of us- employees and third parties acting on our behalf - choosing to always do the right thing. All this takes is a few simple commitments:

We will always:

Comply with this Anti-Bribery and Corruption Policy

Act according to the Glass Designs Ltd Code of Conduct

Be guided by our Vision and Values

Comply with company policy on gifts, hospitality, entertainment, political contributions and charitable donations

Record all activities and transactions accurately, completely and transparently

Follow appropriate due diligence and other risk mitigation procedures before proceeding with any contract or other arrangement

Seek advice if unsure how to proceed

Be alert to 'red flags' (see below) and immediately report or seek guidance about them

Report any suspected or actual breaches of this policy promptly and accurately

We will never:

- Participate in any form of corrupt behavior
- Use company funds, in the form of payments or gifts and hospitality, for any unlawful, unethical or improper purpose
- Authorize, make, tolerate or encourage, or invite or accept, any improper payments to obtain, retain or improve business
- Permit anyone to offer or pay bribes or make facilitation payments on our behalf, or do anything else we would not be permitted to do ourselves
- Offer or give anything of value to a public official (or their representative) to induce or

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reward them for acting improperly in the course of their public responsibilities

- Offer or accept gifts or hospitality, if we think this might impair objective judgement, improperly influence a decision or create a sense of obligation, or if there's a risk it could be misconstrued or misinterpreted by others

Red flags

Red flags are early warning signs of something unethical. They include:

- "No one's going to know"
- "It's not against the law"
- "What's in it for me?"
- "Don't worry, that's just the way business is done around here"
- "Shred/delete that document"

Facilitation payments and kickbacks

We will not offer or accept facilitation payments or kickbacks or engage in any form of corruption, whether directly or through any third party.

Facilitation payments are usually small payments (or gifts) made to public officials in order to speed up or 'facilitate' actions the officials are already duty-bound to perform. Facilitation payments are illegal under the UK Bribery Act 2010 as well as many other countries in which we operate. We make no distinction between facilitation payments and bribes, regardless of their size or the local culture.

The only exception is where a payment is extorted from you. If you feel coerced or that your safety (or that of your family or colleagues) is at risk, then you should make the payment. But report it immediately via the Conduct Line and record the payment as a standard business expense.

Kickbacks and reciprocal agreements or any other form of 'quid pro quo' are never acceptable. We will not participate in cartels, cover pricing, bid-rigging or any form of collusion. We will never accept improper payments to obtain new business, retain existing business, or secure any improper

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advantage.

Gifts and hospitality

All decisions to give or accept gifts and hospitality must be able to withstand the highest levels of both internal and external scrutiny. The fundamental principle here is that no Glass Design employee should do anything which might give rise to a perception or suspicion that

He or she has been unduly influenced by a gift or hospitality or other consideration to show bias for, or against, any organisation whilst performing the duties of their employment.

Any gift or hospitality, given or received, must therefore be in the direct interests of Glass Designs Ltd and be proportionate to that interest. Gifts and hospitality must never be solicited from our clients or third parties.

A **gift** is any item of value provided or offered for personal benefit at a cost that is less than its commercial value, or at no cost.

Hospitality includes any business entertaining, such as travel, accommodation, meals and invitations to events given by Glass Designs Ltd to third parties or received by Glass Designs Ltd from third parties, including, for example, dinners, shows, sporting events, performances and product launches, to name but a few. It can extend to fundraising events held by worthy Causes and charities. It does not include seminars, conferences, training or briefing events or low cost meals or refreshments which take place as an ancillary part of a business meeting Or activity.

All gifts and hospitality must be registered on our Gifts, Hospitality and Conflicts of Interest Register at giftreg.web.

Conflicts of interest

We seek to avoid situations in which our personal circumstances could lead to a conflict of interest. We declare and resolve any potential conflicts as soon as we become aware of them.

A **conflict of interest** is typically where two or more interests compete, potentially compromising a person's judgment or independence. This can include personal and financial relationships with clients, investors, partners, subcontractors or suppliers and occur both internally or externally.

Even the hint or appearance of a conflict of interest can be just as damaging as an actual conflict.

All actual and potential conflicts of interest must be registered on our Gifts, Hospitality and Conflicts of Interest register at giftreg.web.

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Political and charitable donations

We do not make direct or indirect contributions to political parties, causes or to support individual candidates. We do not make donations to charitable organizations or individuals as a way of obtaining a business advantage, either directly or through intermediaries.

A **political or charitable donation** is a financial payment or loan, or a payment in kind made to support a political or charitable cause.

A payment in kind might include gifts, services, advertising, attendance at fundraising events, or support for a think tank with political connections or allowing employees to work for the organization on company time.

As a responsible business, we support local charitable initiatives and other non-profitable organizations, and encourage our employees to participate, giving them the opportunity during working hours to share their time and expertise. We do not allow individuals to make monetary charitable donations or any political contribution in the company's name or to give up their time to gain a business advantage.

Watch out for situations like these:

"A supplier offered me these amazing season tickets. Should I accept them?"

If you're offered a gift that seems out of proportion or designed to influence you, it would be best to decline it. Gifts of low value offered in the normal course of business are acceptable but you must add them to the Gifts, Hospitality and Conflicts of Interest Register found at giftreg.web.

"The only way I'm going to meet my target is if we win that project. I'll do anything it takes to get it."

Fair competition based on our reputation, service and a realistic price is the only way we should win work. Doing whatever it takes never means trying to influence customers directly or via agents by the use of bribes or facilitation payments. This is not acceptable.

"I've been asked to make an extra 'goodwill' payment to ensure prompt delivery of a government licence I need. Can it be justified if it helps the project?"

Facilitation payments to officials are never part of how we do business.

A colleague confides in you about a gift she's received from a supplier. You're

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not sure whether it breaches the anti-bribery and corruption policy but as you don't know the details you ignore it.

Even if you don't know the details you must speak up. Speaking up could save both you and Glass Designs Ltd from serious legal consequences.

If you are ever unsure about whether a course of action is right or wrong, just ask yourself the following questions:

- Would you be happy if your colleagues or the press knew about it?
- Would you be proud to tell your friends and family about it?
- Does it seem honest? If something seems less than totally open and above board, it probably isn't.
- Is it fair? Does it give someone an unfair advantage over others?
- Our company stands for a clear set of values. Does it sit well with these values? If the answer to any of these questions is no, seek advice immediately.

Speaking up

Transparency and openness are the most effective weapons against bribery and corruption and it depends on every single one of us to challenge any suspicious arrangements if confronted with them. Even political contributions, charitable donations and sponsorship arrangements can be used as a cover for bribery. If you have a concern or think that this policy may be being infringed it's important to speak up about it. Speaking up early could protect you from serious legal consequences and protect the company's reputation,

This is critical to our long-term success.

How to raise a concern

There are a number of different ways to raise a concern or get help.

Choose whichever route you feel comfortable with, or suits the situation best.

Face to face

The simplest way to deal with a concern is to talk to the person involved.

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With your line manager

If you don't feel comfortable talking directly about an issue, you could raise it with your line manager or supervisor. If a face to face meeting isn't possible, you can raise an issue in writing by email or letter, perhaps to Human Capital or a Compliance Officer (a list of the Compliance Officers for both Hubs can be found on the Anti-Bribery and Corruption Policy page on iGATE).

External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone externally.

The law recognizes that in some instances, it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice from a Compliance Officer or through the Conduct Line (see below for details) before reporting a concern to anyone external. It will very rarely, if ever, be appropriate to alert the media. Please refer to our corporate communications policy for further details.

What happens next?

We will investigate every allegation or suspicion of a breach of this Policy and take appropriate action. Depending on the circumstances, if the investigation establishes that an act of bribery or corruption has taken place, this may include disciplinary action up to and including dismissal. If you make a report in good faith you will never be penalised for doing so- even if after investigation you were found to be mistaken. Upholding the policy in this way will not harm your career or your relationship with your colleagues.

We will not tolerate any retaliation or discrimination of any kind against anyone who does the right thing. If you or anyone else you know is experiencing retaliation or discrimination, don't put up with it – report it at once. We consider such behavior as unacceptable and a serious matter. We will act against it and protect you.

Code of Conduct

The Glass Designs Ltd Code of Conduct sets clear standards for our behavior and helps us all do the right thing, no matter what situation we're in.

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Statement of commitment

We will not tolerate any form of bribery or corruption.

This policy demonstrates the Glass Designs Ltd Group Board's zero tolerance approach to bribery and corruption. This policy applies to the whole of the Glass Designs Ltd Group and as such should be seen as setting the broad rules and guidance for all.

Our policies are reviewed and updated regularly to evolve with the world around us to make Glass Designs Ltd the company of first choice for all our stakeholders, whilst challenging and changing the image of construction worldwide.

The Board of Directors of Glass Designs Ltd fully endorses this Policy. I personally commit Glass Designs Ltd to this Policy.

Vince McDonnell

Managing Director

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