

Anti-Bribery & Corruption Policy Statement

It is the Company's policy to conduct all aspects of business with integrity, in an honest and ethical manner, with 'zero-tolerance' to bribery, at all times.

Nemein is committed to implementing and enforcing effective systems to counter bribery in accordance with the Bribery Act 2010, and to maintain the highest possible standards of business practice. This policy applies to all individuals working for the Company, including anyone providing services to the Company such as consultants, contractors or other persons acting under or on behalf of the Company.

Failure to observe Company policy may lead to disciplinary action in accordance with the Company's Disciplinary Policy and / or other appropriate action.

Nemein will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or influence the performance of their duties.
- Make, or accept, "kickbacks" of any kind.
- Accept any financial or other reward from any person in return for providing some favour.

Nemein will:

- Keep appropriate internal records, evidencing the business reason for making such payments.
- Encourage employees to raise concerns about any issue or suspicion of malpractice.
- Ensure that anyone raising a concern will not suffer any detriment as a result, even if mistaken.

Gifts, Hospitality and Donations – if in doubt: Check!

This policy does not prohibit giving / receiving promotional gifts of low value or hospitality appropriate to good business practice, including business travel, meals and expenses. Business gift, invitations and hospitality must have management / HR approval to acceptance and be transparent at all times. Gifts offered and refused must also be reported to management / HR. Donations made to charities or other organisations require Director level approval.

Policy Review

Next Review Date: July 2015

This policy will be monitored, reviewed and revised, as required, in the light of legislative or organisational changes and experience and will be reviewed annually. It is the responsibility of senior management to see that all employees receive updates and amendments to the policy.

Suzannah Bourne
Chief Executive Officer

July 2014

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