

ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT

Euroclad Limited, the company, is committed to conducting business honestly, and without the use of acts of bribery to obtain an unfair advantage. This commitment must be reflected in every aspect of the way in which we operate. Every employee and individual acting on the behalf of the Company is responsible for maintaining the Company's reputation and for conducting business honestly and professionally.

The Company attaches the utmost importance to this policy and will apply a "zero tolerance" approach to acts of bribery by any of our employees or third party representatives. Any breach of this policy will be regarded as a serious matter by the Company and is likely to result in disciplinary action up to and including summary dismissal. The board and senior management members are committed to implementing and enforcing effective systems to prevent and eliminate bribery, in accordance with the Bribery Act 2010.

The Company and its subsidiaries must follow this anti-bribery and corruption policy, together with policies on gifts, entertainment and corporate hospitality. Gifts, entertainment and hospitality include the receipt or offer of gifts, meals or tokens of appreciation and gratitude, or invitation to events, functions or other social gatherings, in connection with matters related to our business, these activities are acceptable provided they fall within reasonable bounds of value and occurrence. These policies apply to all employees and all are required to familiarize themselves and comply with them. These policies can be found on the Company intranet and the Central Reference Document binders placed in all staff canteens under section HR-T.

A bribe can broadly be defined as the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal or a breach of trust. Bribes can take on many different shapes and forms, but typically they involve corrupt intent.

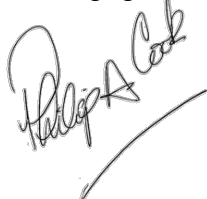
Employees and others acting for or on behalf of the Company are strictly prohibited from making, soliciting or receiving any bribes or un-authorised payments. As part of its anti-bribery measures, the Company accepts transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure, whether given or received.

A breach of these policies by an employee will be treated as grounds for disciplinary action, up to and including dismissal where the breach is considered to be serious or could be construed as gross misconduct. Employees and other individuals acting for the Company should note that bribery is a criminal offence that may result in imprisonment and or an unlimited fine for the individual and an unlimited fine for the Company.

The success of the Company's anti-bribery and corruption measures depend on all employees, and those acting for the Company, playing their part in helping to prevent bribery. Therefore, all employees and others acting for, or on behalf of, the Company are encouraged to report any suspected bribery in accordance with the procedures set out in the policies or in the case of third parties to a Company Director.

If you do not wish to speak directly with anyone within the business, the Company has joined EXPOLINK who are a completely independent organization with impartial staff who handle all calls. This is an anonymous reporting facility for all employees and third parties which can be accessed 7 days a week and 24 hours a day on the following Freephone number: 0800 374 199. The Company will support any individuals who make such a report in good faith.

Managing Director



HR Director

