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Cinetic Landis Ltd – Bribery Statement

The following principles outline Cinetic Landis Ltd's total commitment against all acts of bribery and corruption. Bribery and corrupt practices are never tolerated in the pursuit of Cinetic Landis Ltd's business objectives and goals or within its business relationships or through the actions of its employees and associated parties.

This commitment is driven from the CEO and Board throughout the entire Company and a reciprocal commitment is expected from all who work with the Company and who act on its behalf, either in partnership with it, or are employed or engaged in any capacity by it, in the pursuit of its business.

Scope

The Company considers an act of bribery or an attempt to commit an act of bribery, to include the actual or possible offering, suggestion, requesting or accepting of a financial or other type of business advantage or inducement with the: -

- purpose of rewarding or initiating improper performance of a function or activity within an actual or potential business relationship, function, activity or negotiation involving the Company and/or
- the knowledge or belief that the acceptance of such an inducement or payment would constitute the improper performance of such relationship, function, negotiation or activity.

Company Principles

Cinetic Landis Ltd shall carry out its business, fairly, honestly and respectfully in accordance with any applicable laws and regulations.

Cinetic Landis Ltd shall not offer or suggest the offering of bribes or other inducements, nor will it condone the offering of bribes or other inducements on its behalf, to gain a business advantage or maintain an existing business relationship or business activity. This includes the use of illicit facilitation payments.

Cinetic Landis Ltd shall not accept, nor tolerate the suggestion of an acceptance of bribes or other advantage, nor will it agree to them being accepted on its behalf in order to influence business.

Cinetic Landis Ltd will stand by these principles in all circumstances and situations.

Cinetic Landis Ltd shall avoid doing business with others who do not accept these values and who may harm its reputation. The Company will not undertake business with others who do not uphold similar commitments or accept its commitment against corrupt practices.

Cinetic Landis Ltd seeks to conduct business relationships in such a way that direct or indirect bribery is never considered nor undertaken on its behalf or in its name and that all parties, including partners contractors, advisors, etc, will act in accordance with and supports these values.

Cinetic Landis Ltd expects the pursuit of its business and the undertaking of its business relationships to be within the boundaries of all applicable laws at all times, including those of an extra-territorial scope such as the UK Bribery Act 2010.

Cinetic Landis Ltd maintains for inspection, accurate books and records that properly and fairly document all of its financial transactions in all of its directly controlled activities.

Due Diligence & Risk

Cinetic Landis Ltd shall analyse which specific areas pose the greatest risks from bribery and will design and implement policies to guide the undertaking of any business transaction or relationship accordingly.

Cinetic Landis Ltd shall implement this commitment against bribery in all its business activities over which it has effective control. On cases where the Company has influence through business relationships, or acts as operator or lead partner, it will use its influence to encourage a reciprocal programme and to implement procedures that assess the ethics of the third party.

Cinetic Landis Ltd shall not allow improper payment to be made through agents or associated companies or any other third party.

Cinetic Landis Ltd shall undertake properly documented due diligence before appointing contractors, agents or any relationship that requires directly engaged third parties and will also expect this to be undertaken by the aforementioned for any party they then may engage such as a contractor, partner or advisor in pursuit of Cinetic Landis Ltd's business.

Any significant agreements with contractors, associates and third parties shall require approval at least by the Company's CFO and / or the CEO.

Compensation paid to contracted parties, agents or other intermediaries shall be appropriate and justifiable remuneration for legitimate services rendered.

Contracted parties and other intermediaries shall comply with the Company's stance against corrupt practices including bribery.

Cinetic Landis Ltd maintains the right to monitor the conduct of any contracted third party or other intermediary and shall have the right of termination in the event that they pay bribes or offer inducements or illicit payments or act in a manner unbecoming of its policies or any applicable law.

Gifts & Hospitality

Cinetic Landis Ltd does not allow the offer or receipt of gifts, hospitality or expenses whenever they could affect or be perceived to affect the outcome of business transactions and are not proportionate, reasonable or bona fide.

Employment

Cinetic Landis Ltd commits that no employee will suffer demotion, penalty, or other adverse consequence for refusing to pay bribes or undertake any other illicit facilitation payment, even if such refusal results in the Company losing business.

Donations

Cinetic Landis Ltd shall ensure that charitable donations and sponsorships are not used as subterfuge for bribery, nor that any hospitality or gift should be used in a similar manner.

Cinetic Landis Ltd documents all charitable contributions which are reviewed for appropriateness on a timely basis.

Cinetic Landis Ltd does not allow payment of any political donation undertaken in its name or on its behalf. Cinetic Landis Ltd does not allow any payment or advantage, sought or offered, by or to, any government or public official or body, to be accepted, proffered or given in its name or on its behalf.

Revision & Monitoring

Cinetic Landis Ltd shall review and update its policies, commitments and processes and may revise any element of its business practices and principles on a timely basis.

S.R. Coverdale

Managing Director (August 2011)