

Delta Financial Systems Limited (Delta) is committed to maintaining the highest standards of ethical behaviour in the conduct of its business affairs. The actions and conduct of all of Delta's staff are key to maintaining these standards. Our policy in relation to Ethical Standards applies equally to all staff of Delta Financial Systems Limited regardless of seniority, tenure, or working hours.

All Employees are given a Handbook, which covers Business Standards, Data Protection, Travel and Bribery, and which is reviewed and updated on a regular basis. All employees are actively engaged in complying with the principles outlined therein.

We have regular review checks to ensure we keep up to date with all statutory responsibilities and to ensure that any necessary changes are made and have been communicated to all staff.

We endeavour to adopt sound ethical standards in all of our business. To do so:

- We recognise that acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them in a way that a reasonable person would deem dishonest.
- We recognise that bribery can be defined as offering, promising or giving a financial or other advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper. We recognise that corruption may include bribery but it also covers any abuse of entrusted power for private gain;
- We recognise that bribes can take the form of cash or other inducements such as gifts, hospitality and entertainment, but we do not intend to prohibit normal hospitality provided it complies with the company's Corporate Entertainment Policy;
- It is our view that any bribery or corruption related offences by any employee of Delta would have severe reputational and/or financial consequences for the company.

Delta does not tolerate bribery or corruption in any form. The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the company. Any employee who becomes aware or suspects that any past or future activity is a bribe or is corrupt, has a duty to report it in accordance with the Employee Handbook.

Delta prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- *to or from* any person or company wherever located;
- *by* any employee, director, agent, consultant, contractor or other person or body acting on Delta's behalf;
- *which aims to* gain any commercial or contractual advantage for the company which is unethical or *to* gain any personal advantage, pecuniary or otherwise, whether directly or indirectly.

A Gift Register is maintained and gifts given or received must be recorded where they exceed £50 in value or where events such as hospitality exceeds £250 in value.

Training is carried out for all new employees on joining and annually thereafter.