

Statement of Compliance with the Bribery Act 2010

What is the Bribery Act?

Bribery undermines democracy and the rule of law and poses very serious threats to sustained economic progress in developing and emerging economies and to the proper operation of free markets more generally. The Bribery Act 2010 is intended to respond to these threats and to the extremely broad range of ways that bribery can be committed.

The Bribery Act creates offences of offering or receiving bribes, bribery of foreign public officials and of failure to prevent a bribe being paid on an organisation's behalf. The Act creates a new offence under section 7 which can be committed by commercial organisations which fail to prevent persons associated with them from committing bribery on their behalf.

Our approach to the principles for preventing bribery

Platino Ltd is committed to the highest standards of ethical conduct and integrity in all its business activities. This policy outlines Platino's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. Platino will not tolerate any form of bribery by, or of, its employees, associates or any person or body acting on its behalf. This statement sets out the approach taken to address the principles of the Bribery Code. Any questions on this statement of Platino's approach to Anti-Bribery more generally should be addressed to Tania Ledger tania@platino.co.uk

Principle 1: Proportionate procedures

Our procedures to prevent bribery are clear, practical and well documented. Platino Ltd employees can access our anti-bribery procedures via the Staff Handbook and these are available to other business partners on request.

Principle 2: Top-level commitment

The Board of directors are committed to preventing bribery by persons associated with Platino Ltd. They foster an organisation culture in which bribery is never acceptable. The managing director has issued a formal statement to the staff members and associates demonstrating a commitment to carry out business fairly, honestly and openly.

Principle 3: Risk Assessment

Platino Ltd assesses the nature and extent of its exposure to potential external and internal risks of bribery by associated persons. The assessment is carried out quarterly and a report is presented to the Board.

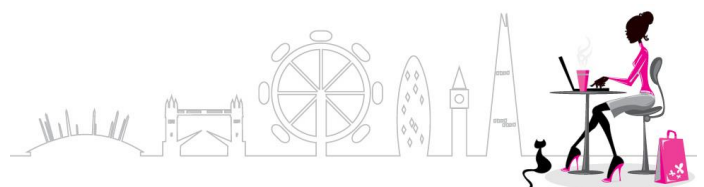
Principle 4: Due diligence

We apply due diligence procedures by taking a risk-based approach, in respect of persons who perform or will perform services for or on behalf of Platino Ltd, in order to mitigate identified bribery risks.



Platino Ltd.
Unit 10 Spitfire Business Park
1 Hawker Road
Croydon
CR0 4WD

T: 020 8681 4829
E: info@platino.co.uk
W: www.platino.co.uk



Principle 5: Communication (including training)

Platino Ltd ensures that its bribery prevention policies and procedures are embedded and understood throughout the organisation through internal and external communication. We ensure that any service providers engaged on our behalf are aware of and understand the Bribery Act 2010.

Principle 6: Monitoring and review

We monitor and review our anti-bribery procedures annually and make improvements where necessary

2.1.20



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