## For Distribution to CPs

## ANTI-BRIBERY AND CORRUPTION POLICY

South West News Service Ltd (SWNS) is committed to carry out business in a fair, honest and open manner.

SWNS operates a zero tolerance approach to bribery and corruption and ensures full compliance with all applicable anti-bribery and corruption laws and regulations, including the UK Bribery Act 2010.

Employees, officers, directors and all other associates ("Associates") of SWNS are prohibited from making any form of payment or inducement on behalf of SWNS that could be construed or interpreted as a bribe. Likewise, Associates are prohibited from receiving any gift or hospitality on behalf of SWNS that creates or appears to create a conflict of interest for the parties involved.

Anti-bribery policies and procedures, appropriate to SWNS and its business, have been implemented and apply to all Associates without exception. Violation of these polices is taken extremely seriously and will result in disciplinary actions, including dismissal in serious cases.

SWNS has a Whistle Blowing Policy which allows the reporting of suspicious activity in a confidential manner. Failure to report known or suspected violations may lead to disciplinary action.

SWNS allows the receipt of gifts, entertainment or hospitality provided these are appropriate for the proper course of our usual business, with reasonable occurrence and value. In addition, Associates are required to ensure that the acceptance of a gift, entertainment or hospitality does not create or appear to create a conflict of interest for the parties involved.

SWNS does not allow political donations or contributions without specific approval of the SWNS Board of Directors.

Any queries should be directed to the Financial Director.

July 2011