

# Anti-bribery and corruption Policy

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## Introduction

This policy sets out the arrangements that we have established to ensure compliance with our legal obligations under the UK Bribery Act 2010 to establish and maintain systems and controls designed, as far as possible, to prevent and mitigate the risk of bribery and corruption in our business.

## Regulatory Requirements

Principle 1 in PRIN 2.1 states that a firm must conduct its business with integrity.

Principle 3 in PRIN 2.1 states that firms must take reasonable care to organise and control their affairs responsibly and effectively, with adequate risk management systems.

The UK Bribery Act 2010 makes it an offence for a UK national or person located in the UK to pay or receive a bribe, either directly or indirectly. Companies and partnerships can also commit an offence for failing to prevent bribery.

## Our Approach

We conduct business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. We uphold all laws relevant to countering bribery and corruption and remain bound by the laws of the UK, including the Bribery Act of 2010, in respect to our conduct both at home and abroad.

Our Financial Crime Risk and Control Self-assessment ("RCSA") identifies and records key risks, controls and oversight in place to mitigate identified risks including bribery and corruption. We believe that bribery and corruption risks have a "rare" likelihood of occurrence, due to both the nature of our business and our client base. The firm's conduct policies, staff training and attestations reduce this risk further.

## Our Control Framework

We have policies in place designed to prevent bribery and corruption. These policies contribute to our wider control framework to effectively manage the risk of bribery and corruption, and to ensure that our business and our clients' best interests are duly protected.

### **Gifts and Hospitality**

This policy includes general disclosure and pre-approval requirements for gifts and hospitality.

### **Charity Donations**

We commit an annual budget for this purpose which is managed and overseen by the Charity Committee. All donations are made through the firm's Charity CAF account. The policy details the approach and controls for donations.

## **Whistleblowing**

Safe and confidential procedures are in place for employees to report and discuss incidents and situations where suspicions of bribery and corruption may arise. These standards are detailed in our Whistleblowing Policy.

## **Code of Conduct**

The Code of Conduct summarises the firm's commitment to operating with integrity. It provides the principles that define our culture and how we run our business. The Code applies to all staff and Directors at group level. It also applies to some third parties such as Consultants or Sub-Contractors working on our behalf.

## **Outsourcing**

Due diligence is performed on our Critical Outsourced Providers at onboarding and periodically thereafter. There are other preventive measures in place to avoid acts of bribery and corruption, including payment approvals, vendor vetting and contract reviews.

## **Monitoring and Oversight**

Any allegation of bribery or corruption involving a business area or one of our employees must be promptly reported to our firm's Money Laundering Reporting Officer. The process for escalation is outlined within the Whistleblowing Policy.

The Compliance team provides advice and guidance, as well as independent challenge and oversight on financial crime.

## **Policy Ownership**

The Compliance Officer is responsible for implementing and monitoring the requirements outlined within this policy. This policy is reviewed annually, and any updates will be approved by the Compliance Committee. Policy changes are disseminated throughout the company when they occur.

## **Training**

New joiners receive and must attest to this policy as part of their Induction.

Bribery and Corruption is included as a standard topic in the periodic Financial Crime training to raise staff awareness and to ensure all staff fully understand what is required of them.

## **Record Keeping**

In accordance with SYSC 9.1, all records described in this policy are retained for the appropriate period, as per legal and regulatory guidelines.