

Anti-bribery and corruption policy

We are committed to conducting business with integrity and take a zero-tolerance approach to bribery and corruption. This policy sets out the systems and controls we have established to prevent and detect bribery, in line with the UK Bribery Act 2010 and relevant FCA principles. It forms part of our wider financial crime risk framework and applies to all staff.

Our intention

- To conduct business ethically and with integrity, taking a zero-tolerance approach to bribery and corruption.
- To uphold all relevant UK laws, including the Bribery Act 2010.

Our approach to achieving this

- **Gifts and hospitality** are subject to **pre-approval/disclosure** requirements to ensure transparency, avoid conflicts of interest and the risk of inducement.
- Our **Code of conduct** ensures that all staff and third-party contractors are aware of our expected behaviours and standards.
- Charitable donations are managed centrally through the firm's **Charity Committee** to ensure fair and impartial outcomes.
- **Whistleblowing procedures** are in place to allow employees to raise concerns confidentially.
- **Due diligence** is conducted on all Critical Outsourced Providers and **controls** exist for payments, vendor onboarding, and legal contracts.

Our expectations of you

- Always act honestly, professionally and with integrity in business dealings.
- Do not offer, promise, give, solicit, or accept bribes or anything that could be perceived as such.
- Disclose and seek approval for gifts, hospitality, or charitable donations as required.
- Raise any suspicions or concerns about potential bribery or corruption through the whistleblowing channels.
- Complete all required training and attestations.

Roles and responsibilities

- **Line Managers:** Ensure staff understand their responsibilities and escalate any concerns.
- **Compliance Officer:** Owns this policy, monitors adherence and provides guidance.
- **Compliance Committee:** Reviews and approves updates and oversees overall effectiveness of the anti-bribery control framework, as delegated by the Board.

Regulatory requirements

- **UK Bribery Act 2010** makes it an offence to offer, receive, or fail to prevent bribery.
- **FCA Principle 1:** Conduct business with integrity.
- **FCA Principle 3:** Take reasonable care to organise and control affairs with effective risk management.

Associated with

- Wider policy framework including financial crime, gifts and hospitality, and outsourcing, policies.
- Whistleblowing procedure
- Code of conduct
- Financial crime risk control self-assessment

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Compliance Officer and MLRO
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