

## Anti-Bribery Policy

### 1. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations in particular the Bribery Act of 2010 and to ensure that the Practice's business is conducted in a socially responsible manner.

### 2. Policy statement

It is our policy to conduct all of our business in an honest and ethical manner. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

### 3. Scope

#### 3.1 Who is covered by the policy?

This policy applies to all employees

This policy covers:

- Bribes;
- Gifts and hospitality;

#### 3.2 Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor)

#### 3.3 Gifts and hospitality

Employees must not offer or give any gift or hospitality:

- which could be regarded as illegal or improper, or which violates the recipient's policies; or
- to any public employee or government officials or representatives, or politicians or political parties;

Employees may not accept any gift or hospitality from our business partners if:

- It is in cash; or there is any suggestion that a return favour will be expected or implied.

If in doubt consult a Partner.

### 4. Who is responsible for the policy?

The Partners have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Where necessary a risk assessment of proposed activities will be undertaken.

### 5. Monitoring and Review

The Partners will undertake a periodic review of Policy in relation to the Practice activities, client base, sectors of operation, and any changes to the Bribery Act.

Signed



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Position: Director  
Date: 3<sup>rd</sup> January 2018  
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