

Anti-Bribery & Corruption Policy Statement

We will conduct business in an honest and ethical manner. As part of that, the Firm takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships, wherever it operates, and implementing and enforcing effective systems to counter bribery.

The Firm will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it conducts business, including, in the UK, the Bribery Act 2010 (the **Act**), which applies to conduct both in the UK and abroad.

We are required to carry out Source of Wealth/Funds checks for financial transactions and if this arises any suspicion of wealth or funds originating from any form of Bribery or Corruption, we will be unable to complete on the matter, this is particularly prevalent where a client is a Politically Exposed Person (PEP) or the family/associate of a PEP. This may also result in a report to the National Crime Agency (NCA)

This next section of the policy applies to all individuals working for or on behalf of the Firm at all levels.

- A bribe is an inducement or reward offered, promised or provided in order to improperly gain any commercial, contractual, regulatory or personal advantage, which may constitute an offence under the Act. The Firm may also be liable under the Act if it fails to prevent bribery by an associated person.

This policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from Third Parties. If there are concerns, please check with the partners.

- The Firm only makes charitable donations and provides sponsorship that are legal and ethical with the Firm's internal policies and procedures.
- We keep appropriate financial records and have appropriate internal controls in place which evidence the business reason for gifts, hospitality and payments made and received.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All Workers are required to avoid any activity that might lead to, or suggest, a breach of this policy

- Workers are required to notify the Firm as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future, or if they are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.
- Any employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct.
- If any Third Party is aware of any activity by any Worker which might lead to, or suggest, a breach of this policy, they should raise their concerns with the Firm's Anti-Bribery Compliance Partner, Stephen Morrison.

Training on this policy is provided for all Workers and our zero-tolerance approach to bribery and corruption will, where appropriate, be communicated to clients, suppliers, contractors, and business partners. The Firm monitors the effectiveness and reviews the implementation of this policy annually. Any improvements identified are made as soon as possible. Internal control systems and procedures are also subject to regular review to provide assurance that they are effective in countering any risks of bribery and corruption.

All Workers are aware that they are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.