

ANTI-CORRUPTION POLICY

POLICY STATEMENT

It is the Firm's policy to avoid all instances of corruption, including bribery, extortion, fraud, deception and collusion. This Policy sets out responsibility and guidance in this respect, and applies to all individuals employed by or otherwise associated with the Firm.

RESPONSIBILITIES

The Firm will uphold all laws relevant to countering bribery and corruption. The Director appointed with overall responsibility is Colin Herman, to whom all queries should be referred. Our aim is to encourage the effectiveness of this Policy and to support anyone who assists in the prevention and reporting of any suspected malpractice.

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. It is a criminal offence to take part, directly or indirectly, in any form of corruption, for personal gain or the benefit of any third party. It is not acceptable for you or someone on your behalf to offer or accept bribes (cash or kind), or engage in any activity that might lead to a breach of this Policy. Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve the right to terminate our contractual relationship with any party associated with the Firm if they breach this Policy.

Any person aware of corrupt activity connected to the Firm's business must therefore make full disclosure at the earliest possible opportunity. Key to upholding this Policy is awareness of the potential for malpractice and openness.

CORPORATE ENTERTAINMENT AND GRATUITIES

We will continue to involve ourselves in corporate hospitality which seeks to improve the Firm's image, promote its services and establish cordial relations. However, all gifts and invitations must be referred to the Head of Department before offering or accepting.

We will remain alert to offers which may be perceived to influence a business decision, for example in the lead up to a tender, or payment to an official in excess of any genuine administration fees. Heads of Department will raise awareness to employees of the bribery risks associated with their service sector.

Whereas anything of a personal nature has the potential to fall outside acceptable levels, modest "thank you" gifts or an invitation to sporting or social events may be acceptable, unless offered or received in any sense as inducement for future work or to otherwise gain a business advantage.

IMPLEMENTATION

Employees and individuals associated with the Firm are required to:

1. Immediately report any malpractice instance, attempt, threat or pressure, to the Head of Department.
2. Declare all gifts and invitations (whether for team or individual) to the Head of Department, who will monitor and report any inconsistency to Colin Herman.
3. Maintain all accounts, invoices, and administration records relating to the business of the Firm (clients, suppliers, administration records) with strict accuracy and completeness.
4. Ensure that all business expenditure is paid by either bank transfer (BACS), cheque or credit card. The only exception is small items of petty cash.

The Firm will maintain a record of incidents including investigation of complaints or feedback in respect of individuals employed by or otherwise associated with the Firm.