

Barnett Waddingham's Anti-Bribery Policy Statement

Introduction

The Bribery Act 2010 (the Act) introduced individual and corporate crimes including "failure to prevent" bribery, which we fully endorse as a good business practice.

Summary

We have a zero tolerance approach to bribery and have procedures, which we train our people regularly, which include but are not limited to;

- Anti-bribery policy statement
- BW Code of ethics
- Conflicts of interest
- Restricting the giving and receiving of gifts and hospitality;
- Keeping accurate and detailed records of all financial transactions;
- Monitoring the risks we face and updating the appropriate systems and controls;
- Responding to all reports of actual or potential illegal activity;
- Reporting actual and potential instances of bribery and corruption to the relevant authorities;
- Fraud policy;
- Authorities and expenditure policy
- Personal investment, shares and market abuse

Our Values

We are committed to carrying out business fairly, honestly and openly and we do not tolerate bribery in any form. We may take action to cease relationships with those that involve themselves in bribery where we consider it would be inappropriate to continue the relationship.

The implementation of anti-bribery procedures is not simply to meet our legal obligations, but also to promote good ethical behaviour and reliability which is tantamount to limiting our exposure to bribery. This document, therefore, outlines clearly our anti-bribery stance, which is embedded within our corporate culture.

Policy

We take the prevention of bribery very seriously and do not endorse or condone bribery. All staff, consultants, contractors and any individuals associated with us **must not directly or indirectly:**

- offer; give; solicit or accept any bribe, either in cash or any other form of inducement, to or from any private individual or company, whether or not, acting in the capacity of a public official or agent, wherever they are located; in order to
- offer; give; solicit or accept any bribe, either in cash or any other form of inducement, to or from any private individual or company, whether or not, acting in the capacity of a public official or agent, wherever they are located; in order to
- gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected to the individual.

All those to whom this policy applies must ensure that any third party which is undertaking business for or on our behalf must also comply with this Policy or maintain equivalent standards and safeguards to prevent bribery and corruption.

Reporting

All persons covered by this policy must report any attempt of bribery or corruption internally as detailed in our Raising a concern policy, which allows for anonymous reporting where required.

Breach

Any actual or potential breach of this policy will be investigated impartially and thoroughly. A breach of this policy is a serious disciplinary offence which could include dismissal. In the case of third parties suspected of or being found to be bribing or attempting to bribe us, our people, associated individuals, a supplier or a client, they will be informed in writing of the event that occurred, business dealings will be ceased and the appropriate authorities will be informed.