

Anti-bribery and Corruption Policy

1 Our Policy

We aim to conduct our business activities with honesty and integrity at all times and will not participate in initiatives designed to provide an 'unfair' advantage to the Regulated Firms or any third parties.

For example, we do not offer or receive any form of unethical inducement or payment, including (but not limited to) 'facilitation payments' and 'kickbacks'.

2 Statement

We prohibit:

- The offering, giving, solicitation or acceptance of any bribe, whether cash or other inducement:
 - To or from any person, company, or other organisation, wherever they are situated, and whether or not they act in a public or private capacity.
 - By any employees, officers, beneficial owners, agents or other person or body acting on behalf of the Regulated Firms.
 - In order to gain any commercial, contractual or regulatory advantage for the Regulated Firms in a manner which is unethical.
 - Or in order to gain any personal advantage, financial or otherwise, for the individual or anyone connected with that individual.

3 Operation and Implementation

To achieve our Policy, we are committed to:

- Communicating this Policy to employees, officers and other affected parties.
- Training the Regulated Firms' employees and officers to recognise and report any corrupt practices undertaken by themselves or others.
- Providing effective reporting mechanisms which are simple to use and readily accessible.
- Protecting 'whistleblowers' by handling information received with sensitivity and confidentiality.
- Rigorously investigating all allegations of fraud, bribery and other corrupt practices.
- Immediately informing the police and relevant authorities where a crime may have been committed.
- Cooperating fully with officials during any investigations or legal proceedings.
- Taking swift action against anyone confirmed as being involved in corrupt practices.
- Implementing disciplinary procedures concerning anyone in breach of Policy.
- Monitoring the effectiveness of this Policy on an ongoing basis by regularly reviewing our systems and controls.
- Periodically reviewing and updating this Policy to ensure it keeps pace with best practice.

In implementing this Policy we:

- Encourage vigilance in identifying and reporting corrupt practices.
- Uphold all relevant laws designed to counter bribery and corruption, particularly any laws relating to specific business practices.
- Establish specific standards to ensure that all employees, officers, or other persons acting on our behalf do not engage in corrupt practices.
- Ensure a fair and transparent selection process is applied prior to the appointment of any external service providers, partners or other third parties.
- Include in agreements with third parties acting on our behalf, a requirement that they do not engage in any illegal, improper or questionable conduct.
- Scrutinise all remuneration paid to external third parties acting on our behalf, a requirement that they do not engage in any illegal, improper or questionable conduct.
- Scrutinise all remuneration paid to external third parties to ensure it is appropriate, justifiable and paid through legitimate channels.
- Ensure accurate records are properly maintained of all financial transactions; these records will be available for inspection where a legitimate request is received.
- Require an 'Annual declaration' to be completed by all employees and officers of the Regulated Firms confirming that they have received a copy of this Policy and are fulfilling its requirements
- Publicise our Policy (where appropriate) to external parties, including (but not limited to) customers, suppliers, contractors, business partners and wider stakeholders.
- In extreme circumstances where there is a threat to life, it is of course acceptable for Anti-Bribery & Corruption requirements to be breached. However, our strict reporting and disclosure of any such incidents must be followed as soon after the event as practicable.

We will not make contributions (directly or indirectly) to political persons, parties or associated organisations.

4 Responsibilities

Preventing, detecting and reporting of bribery is the responsibility of everyone working for, or on behalf of, the Regulated Firms. All such persons (including agency staff and external contractors) must therefore:

- Act with honesty and integrity at all times.
- Safeguard the Regulated Firms resources for which they are responsible.
- Respect our customers, suppliers and any other parties with whom the Regulated Firms interacts, in order to achieve our objective of conducting business in an ethical, lawful and professional manner.
- Comply with the 'spirit and letter' or law and regulations of all countries in which the Regulated Firms operates or hopes to operate, in respect of the lawful and responsible conduct of business.

The Board of Directors attaches the utmost importance to this Policy and will apply a 'zero tolerance' approach to acts of bribery and corruption. Any breach of this Policy will be regarded as a serious matter and is likely to result in disciplinary action which may ultimately result in dismissal. Primary responsibility for implementing this Policy and for reporting bi-annually to our Board of Directors rests with Stuart Shepley, Director.

Where it is confirmed or suspected that an external third party is guilty of bribing or attempting to bribe our employees, officers, suppliers or customers, they will be informed in writing that any business dealings with them will be ceased immediately and the appropriate authorities will be informed.

5 Raising Concerns and Seeking Further Guidance

Everyone covered by the scope of this Policy is encouraged to raise concerns about any suspicions about any suspicions or examples of corruption at the earliest possible stage. All concerns must be reported using our Whistleblowing procedure.

Where it is proving difficult to decide whether or not an activity is appropriate, or it is unclear if an action conforms to this Policy, the matter should be referred to a Director of the Regulated Firms.