



Sweetnam & Bradley Ltd

Anti-Corruption & Bribery Policy

1. Introduction

The purpose of this document is to set out the company's policy in relation to bribery and corruption. The policy applies strictly to all employees, directors, agents, consultants and contractors carrying out activities or acting on behalf of the company.

The actions and conduct of the company's employees, as well as others acting on the company's behalf is key to maintaining these standards.

2. Understanding and recognising bribery and corruption

Acts of bribery or corruption are designed to influence an individual in the performance of his or her duty and incline him or her to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances, or *"giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so"*. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to inappropriately influence a decision.

3. Legislation & penalties

In the UK we are bound by the UK Bribery Act 2010. Under that Act, bribery by individuals is punishable by up to ten years' imprisonment and/or an unlimited fine. If the company is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could also face an unlimited fine.

Any conviction for a bribery or corruption related offence would have severe reputational and / or financial consequences for the company.

4. Sweetnam & Bradley's Policy

Sweetnam and Bradley will not tolerate bribery or corruption in any form.

The company prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- *to or from* any person or company wherever located, whether a public official or public body, or a private person or company;
- *by* any individual employee, director, agent, consultant, contractor or other person or body acting on the company's behalf;
- *in order to* gain any commercial, contractual, or regulatory advantage for the company in any way which is unethical or *to* gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- normal hospitality.
- providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only;
- Commission payments to third parties for the introduction of new business, which would be part of standard new business processes.

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to your Manager. If necessary, guidance should also be sought from the Directors.

The company will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

5. Key risk areas

Bribery can be a risk in many areas of the company. Below are the key areas you should be aware of in particular:

Excessive gifts, entertainment and hospitality: can be used to exert improper influence on decision makers. Gifts, entertainment and hospitality are acceptable provided they are approved by management.

Reciprocal agreements: or any other form of "*quid pro quo*" "*a favor for a favor*" is never acceptable unless they are legitimate business arrangements which are properly documented and approved by management. Improper payments to obtain new business retain existing business or secure any improper advantage should never be accepted or made.

Actions by third parties for which the company may be held responsible: can include a range of people i.e. agents, contractors and consultants, acting on the company's behalf. Appropriate due diligence should be undertaken before a third party is engaged. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract and due diligence undertaken. Any payments to third parties should be properly authorised and recorded.

Record keeping: can be exploited to conceal bribes or corrupt practices. We must ensure that we have robust controls in place so that our records are accurate and transparent.

6. Employee responsibility and how to raise a concern

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the company. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this.

Any such incidents should be reported to management.



Christian Olejnik
Managing Director