

Anti Bribery and Corruption Policy

The Bribery Act 2010 came into force on 1 July 2011

A copy of this policy is to be provided to each member of staff for signature as part of their contract of employment.

This document sets out the rules of the Practice in relation to anti-bribery and corruption matters in the United Kingdom. Compliance with the Practice's policy in relation to bribery and corruption is regarded as part of each member of Staff's contract of employment. If an employee fails for any reason to follow the rules set out in this document this may result in disciplinary action being taken against them which could result dismissal.

Bribery is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, in the conduct of the Practice's business.

Corruption is the misuse of entrusted power for private gain.

To place this in context, you should be aware that if you engage in activities which are contrary to UK anti-bribery and corruption legislation, you could face up to 10 years in prison and/or an unlimited fine, and the Practice could also be liable to an unlimited fine and Government sanction.

This policy document is not regarded as exhaustive, but does give specific examples of situations and sets out the rules and procedures and which should be followed.

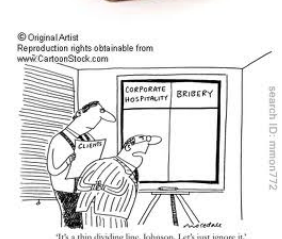
If you are at any time uncertain as to whether your actions will comply with this policy, you must seek guidance from the Director.

You should at all times act in accordance with the following provisions:-

- behave honestly, be trustworthy and set a good example;
- use the resources of the Practice in the best interests of the Practice and you should not misuse those resources;
- make a clear distinction between the interests of the Practice and your private interests to avoid any conflict of interest, and if such conflict does arise you should report it to the Director immediately;
- ensure that any community support, sponsorship and charitable donations do not constitute bribery, and if in doubt you should consult the Director;
- confidentially report all incidents, risks and issues which are contrary to this policy document to the Director;
- raise any issues regarding anti-bribery and corruption laws and the Practice's policies. Queries will be dealt with anonymously and a written response will be issued;
- Do not offer or accept bribes.

Do not, without express prior written approval from the Director, offer or accept any gifts or hospitality to or from clients, contractors, suppliers, other third parties or public officials.

Staff should read this document and sign the relevant policy sheet on Reception



Gifts are presents such as flowers, vouchers, food and drink.

Event and travel tickets given to you as an individual are also gifts when they are not to be used in a hosted business context.

Hospitality includes invitations to hosted meals, receptions and events for business purposes.

Do not offer money to any public officials in order to speed up service or gain improper advantage. This type of bribery is a 'facilitation payment' and is illegal. If you are faced with a demand for a facilitation payment you must:

1. actively resist the payment;
2. inform the Director.

The UK anti-bribery and corruption legislation applies to all activities of a UK-based business no matter where they are carried out in the world. This policy therefore applies to ALL activities worldwide, whatever the local law, practice or custom may be.

By complying with this policy document we aim to ensure that you and the Practice will not at any time knowingly breach any relevant anti-bribery and corruption legislation and also that by adhering to the Policy the Practice can demonstrate that it has adequate procedures in place to prevent such activity.

You have an independent obligation to prevent bribery and corruption in the Practice and to ensure that any interaction with public officials complies with this policy document and relevant laws.

Please confirm you have read and understood this policy document by signing and dating below.

Staff should read this document and sign the relevant policy sheet on Reception

This is a requirement of your carrying out duties with the practice

