

Anti-Bribery and Corruption

We conduct our business activities with Integrity, Professionalism and Respect. These core values are central to maintaining the reputation of AmcoGiffen and our continued business success.

This Anti-Bribery and Corruption Policy applies to all AmcoGiffen “colleagues” including ALL agents or workers operating on behalf of the company. AmcoGiffen will uphold all laws relevant to countering bribery and corruption including the Bribery Act 2010 (‘the Act’), in respect of its conduct both at home and abroad.

AmcoGiffen do not tolerate, permit, or engage in bribery, corruption, or improper payments of any kind in our business dealings, in the UK or anywhere else in the world, both with public officials and people in the private sector.

We consider compliance with anti-bribery laws to be more than a legal requirement. Working with integrity is one of our core values and anti-bribery is at the heart of those values.

As set out in our Code of Conduct and Business Ethics, our anti-bribery principles can be summarised as follows:

- **DO NOT** offer payments to someone (or any other favours, gifts or hospitality) if this might involve someone misusing their position or if someone may perceive that they are being requested to do so.
- **DO NOT** misuse your position in connection with payments (or any other favours, gifts or hospitality) for the benefit of yourself or others, or accept any of these advantages if you perceive you might or are being requested to misuse your position.
- **DO NOT** offer or give any gifts or hospitality where they are prohibited by the organisation for whom the intended recipient works (and in this regard always understand any specific rules of our clients and customers, whilst also strictly complying with our own gifts and hospitality policy).
- **DO NOT** offer payments to someone (or give other favours, gifts or hospitality) to try to influence public officials for business reasons. If you need to promote our business with a public official, always discuss this in advance with a Regional Managing Director or AmcoGiffen's Ethics Team.
- **DO** be aware that requests for commissions, donations, expense claims and various other forms of payment, expenditure or advantage can sometimes be disguised bribes.
- **DO** exercise common sense when considering issues involving your conduct and the conduct of others acting on our behalf. For example:
 - Could the activity be considered dishonest, unethical or illegal?
 - Could there be other negative consequences?
 - Could harm be caused to AmcoGiffen's or your own reputation?
 - In the case of gifts and hospitality, is it reasonable and proportionate?
- **DO** ensure that any gifts or hospitality accepted or offered by us are modest at all times and within the bounds of recognised business practices, are not lavish or excessive and are declared in accordance with our Gifts and Hospitality policy.

POL-HR-05 POLICY STATEMENT

- **DO** wherever required under our policies, seek approval for offering or receiving a gift or hospitality and submit relevant details to be registered in our Gifts & Hospitality register.
- **DO** follow our policies and procedures to conduct anti-bribery due diligence on third parties prior to entering into agreements with them; and apply further risk based due diligence measures on an ongoing basis as required.
- **DO** raise any bribery 'red flags' that you identify with your line manager or with the AmcoGiffen Ethics Team, HR Director or Senior HR Manager.

Any colleague found to be in breach of these principles will face disciplinary action. No colleague will suffer demotion, penalty, or other adverse consequence for refusing to pay bribes, even if it may result in AmcoGiffen losing business.

We will avoid doing business with others who do not commit to doing business without bribery.

We are committed to an ongoing programme to counter the risk of AmcoGiffen being involved in bribery.

Any concerns relating to a breach or suspected breach of this policy should be reported by colleagues to the AmcoGiffen Ethics Team who can be contacted at ethics@amcogiffen.co.uk.



John Booth

Managing Director