

The Firm's Anti-Bribery Policy

The Firm values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation.

Personnel will not offer or accept bribes either directly or indirectly in cash, gifts, hospitality or any other form of encouragement which could reasonably be seen to be an inducement to act other than in good faith, impartially or otherwise in its position of trust to customers.

The Firm will rigorously investigate instances of alleged bribery and assist the police and other appropriate authorities in any resultant prosecution.

The Firm will take firm and vigorous action against any individual(s) involved in bribery.