

Anti-Bribery Policy Statement

- We are committed to carrying out our business fairly and honestly and have zero tolerance to bribery and all other corrupt business practices
- We will not make or accept bribes, nor will we condone the offering or acceptance of bribes on our behalf
- The provision or exchange of gifts or invitations may be authorised but must be done with common sense, in a conscientious manner and with transparency. Each act is to be recorded and must be previously authorised by the Exec board when it goes beyond the defined threshold
- We will comply with the requirements of the Bribery Act 2010. Pick Everard will also take into account specific client requirements and guidance provided by professional bodies
- The Chief Executive Officer is responsible for ensuring compliance with the Bribery Act 2010 and with this Policy. The Policy will be reviewed at least annually by the Executive Board to ensure continuing compliance
- The Executive Board together with the Senior Management Team have responsibility for implementing this Policy
- All staff will be encouraged to be vigilant and to report any suspicions of bribery
- We will ensure that all employees and suppliers are aware of our principles
- We will provide all staff with suitable channels of communication to ensure that any breach or suspected breach of this Policy can be brought to the attention of Senior Management without fear of recrimination
- We will ensure all breaches or suspected breaches of this Policy are fully investigated and, if appropriate, invoke disciplinary measures and take action to remedy the breach and prevent reoccurrence
- We will keep concise and accurate records

| This Policy will be reviewed annually as a minimum.

Signed for the Partnership:



Duncan Green
Chief Executive Officer