

# Prevention of Bribery & Corruption Policy



## Purpose

It is the purpose of this document to set out the Prevention of Bribery and Corruption Policy of the Firm as required by the Bribery Act 2010.

## General Policy

It is the policy of Tony Gee and Partners LLP:

- To conduct business with integrity in an honest and fair manner, and to expect the same from those with whom we do business.
- That the direct or indirect offer, payment, soliciting or acceptance of bribes in any form (including facilitation payments and improper non-financial advantages) is unacceptable.
- To recognise its obligations to meet all relevant legislative requirements pertaining to corruption which apply to any of the Firm's undertakings both in the UK and overseas, including the Bribery Act 2010.
- To organise and arrange its affairs to ensure compliance with the policy.
- To control, monitor and review the policy at intervals not exceeding 12 months and to revise as necessary in intervening periods to comply with current legislation and changes in the assessment of risk.
- To ensure that training is provided for all staff, both permanent and temporary, appropriate to their potential exposure to bribery and corruption.
- To ensure that all new employees receive induction training on the identification and prevention of bribery and corruption within one month of appointment.

The LLP Members and Management are committed to the implementation of all the contents of this policy and will ensure that adequate resources are made available to ensure compliance. It is every employee, sub-contractor, agent and business partner's responsibility to co-operate fully in the implementation of this policy and to consider it their duty to the Firm, to other employees and to the general public so to comply.

Neglect by any employee, sub-contractor, agent or business partner regarding the Firm's Prevention of Bribery and Corruption Policy will be viewed as a serious breach of its stated aims and may result in criminal proceedings and/ or disciplinary action being taken against such an employee or termination of contracts with sub-contractors, agents or business partners.

The allocation of duties for anti bribery and corruption matters and the particular arrangements that the Firm will make to implement its Policy are set out within the operational procedures contained within the Quality Management System.

Our policy will serve as a constant reminder of our responsibility to conduct business in an honest way, without the use of corrupt practices or acts of bribery.

Signed:

C J Young  
Executive Managing Director

Dated: January 2019