

Anti-bribery policy statement

The Bribery Act 2010 (the Act) came in to force on 01 July 2011. The Act introduces individual and corporate crimes including “failure to prevent” bribery, which Barnett Waddingham fully endorses as good business practice.

Barnett Waddingham has undertaken an assessment of the risks which it considers it is exposed to, in order to ensure that this statement and the procedures are both proportionate and appropriate. The assessment of risks is an on-going process and as such this policy and the associated procedures may be amended, as is necessary, to reflect any changes to regulation or the risks that Barnett Waddingham is faced with.

Our values

Barnett Waddingham is committed to carrying out business fairly, honestly and openly and does not tolerate bribery in any form either in an attempt against Barnett Waddingham or in the action of its staff or individuals associated with it. We may take action to cease relationships with those that involve themselves in bribery where we consider it would be inappropriate to continue the relationship.

Barnett Waddingham believes that the implementation of anti-bribery procedures, not simply to meet its legal obligations, but also to promote good ethical behaviour and reliability is tantamount to limiting its exposure to bribery. This document therefore outlines clearly our anti-bribery stance, which is embedded within our corporate culture. This document has been challenged and agreed by senior members of Barnett Waddingham and applies at all levels of the business.

Policy

Barnett Waddingham takes the prevention of bribery very seriously and does not endorse or condone bribery. All staff (including Associates, Partners and Consultants or contractors) along with those individuals associated with Barnett Waddingham **must not directly or indirectly**:

- offer; give; solicit or accept any bribe, either in cash or any other form of inducement, to or from any private individual or company, whether or not acting in the capacity of a public official or agent, wherever they are located; in order to
- gain any commercial, contractual or regulatory advantage for Barnett Waddingham in a way which is unethical; or in order to
- gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

Scope

This policy applies to all staff (including Associates, Partners, Consultants or contractors) in relation to all activities undertaken by, or on behalf of Barnett Waddingham. All those to whom this policy applies must ensure that any third party which is undertaking business for or on behalf of Barnett Waddingham must also comply with this Policy or maintain equivalent standards and safeguards to prevent bribery and corruption.

Summary of procedures

Barnett Waddingham has a zero tolerance approach to bribery and have procedures which include but are not limited to;

- Restricting the giving and receiving of gifts and hospitality
- Keeping accurate and detailed records of all financial transactions
- Monitoring the risks we face and update the appropriate systems and controls
- Training all staff regularly
- Responding to all reports of actual or potential illegal activity
- Reporting actual and potential instances of bribery and corruption to the relevant authorities

Reporting

All persons covered by this policy must report any attempt of bribery or corruption to the Compliance Officer. If the reporter wishes to remain anonymous they may wish to report via the whistleblowing procedure.

Breach

Any actual or potential breach of this policy will be investigated impartially and thoroughly. A breach of this policy is a serious disciplinary offence which could include dismissal. In the case of third parties suspected of or being found to be bribing or attempting to bribe Barnett Waddingham, its staff (including Associates, Partners, Consultants or contractors), a supplier or customer they will be informed in writing of the event that occurred, business dealings will be ceased and the appropriate authorities will be informed.