

Anti Bribery Compliance Policy

Issue date: 11/2020

Confidential V3.0 Compliance - Updated Annually – Owner Richard Weddell CCO Europe.



We are committed to applying the highest of ethical conduct and integrity into the business. It's important that we retain the right ethical standards when conducting our day to day activities.

Scope

This policy applies to all employees and offices, temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, the business within the UK and overseas. All are responsible for maintaining the highest standards of business conduct. The Business owner is – Richard Weddell, Chief Compliance Officer, Europe.

The Business may face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010.

The Bribery Act 2010 is in force from July 1, 2011. The policy covers:

- The main areas of liability under the Bribery Act 2010
- The responsibilities of employees and associated persons acting for, or on behalf of, the company
- The consequences of policy breaches

Bribery and Corruption Risk Appetite Statement

We have a “zero-tolerance approach” to bribery and corruption and we fully comply with our obligations under the Bribery Act 2010.

We operate a strict anti- bribery programme to prevent unethical behaviour and to prevent bribery. This policy forms a key part of this programme, together with employee training.

Employees should not offer or accept a bribe under any circumstances. A ‘bribe’ is where person A gives something (which may be financial or some other kind of benefit) to person B, to persuade person B to (or reward person B for) doing something that they shouldn't be doing (or not doing something they should be doing).

Political or charitable donations must not be made on behalf of any of our clients.

We ask our people and all our associated persons to support us in developing a culture preventing bribery by associated persons through the sales process, procurement, commercial negotiation and all other business practice.



Compliance and Verification

We aim to create a working environment where employees have the opportunity to voice their concerns about behaviour or decisions that they believe are unethical.

The Compliance Department monitors the effectiveness and reviews the implementation of this policy at appropriate intervals, considering its suitability, adequacy and effectiveness. Any improvements identified are made as soon as possible. Internal control systems and procedures are also subject to regular review to provide assurance that they are effective in countering any risks of bribery and corruption.

The Compliance Department is responsible for initiating and supervising the investigation of all reports of breaches of this policy. In practice such investigations may be carried out by line management or other central functions where this is most appropriate. Executive Management together with HR is responsible for ensuring that appropriate disciplinary action is taken when required.

To monitor adherence to our Anti Bribery Controls; the compliance department will carry out the following activities:-

- Bribery Risk Assessment every 6 months.
- Anti Bribery Audit every 12 months.
- Record on the Bribery Register at identified incident of Bribery.

Our external auditors may be asked to report on any practice they discover in the course of their work that they suspect may breach this Policy.

Key Performance Indicators / Report relating to compliance are prepared on an annual basis and submitted to the December ARCC Meeting on an exception basis.

All Workers are aware that they are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

How to raise a concern

All affected parties are encouraged to raise with us concerns about any issue or suspicion of malpractice at the earliest possible stage. Any concerns or issues should be referred to Richard Weddell, Chief Compliance Officer, Office number: 01270 413426, Mobile: 07717 207303, Email: richard.weddell@assurant.com.