

Anti-Corruption & Bribery Policy

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We are bound by the Bribery Act 2010.

The purpose of this policy is to:

- a. set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- b. provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Gifts and hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

The giving or receipt of gifts is not prohibited, if the following requirements are met:

- a. it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- b. it is given in our name, not in your name;
- c. it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- d. it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- e. taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- f. it is given openly, not secretly; and
- g. gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without prior approval.

Sandersons does not tolerate any form of bribery or corruption. We keep records of any noteworthy gifts or hospitality received. If there is any suspicion that there may be a breach of the Act our staff will refer the matter immediately to the partners.

Please [contact us](#) if you have any concerns.