



Anti-Bribery Policy

October 2017 (To be reviewed December 2018)



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1. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery regulations, and to ensure our business is conducted in a socially responsible manner. This policy applies to all the countries and territories that we as an organisation operates in.

2. Policy Statement

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

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. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, implementing, and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

3. Scope

3.1 Who is covered by the policy?

In this policy, third party means any individual or organisation you meet during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties. All arrangements with third parties should be subject to clear contractual terms, including specific provisions requiring them to comply with minimum standards and procedures in relation to bribery and corruption. Appropriate wording to be included in contracts can be obtained from the Legal team.



This policy applies to all employees (whether permanent, fixed -term or temporary), consultants, contractors, trainees, seconded staff, home workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as employees in this policy). It also applies to Officers, Trustees, Board and or Committee members and Members (any membership level)

This policy covers:

- Bribes;
- Gifts and hospitality
- Facilitation payments
- Political contributions
- Charitable contributions

3.2 Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, employees must not bribe a foreign public official anywhere in the world.

3.3 Gifts and hospitality

Please see our Gifts Policy in the Employee Handbook.

3.4 Facilitation payments and kickbacks

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low-level officials to obtain a level of service, which one would normally be entitled to.

Our strict policy is that facilitation payments must not be paid. We recognise, however, that our employees may be faced with situations where there is a risk to the personal security of an employee or his/her family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

- Keep any amount to the minimum



- Create a record concerning the payment
- Report it to your line manager

3.5 Political contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

3.6 Charitable contributions

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices]. No donation on behalf of the organisation must be offered or made without the prior approval of a member of the Leadership Team.

4. Record keeping

You must declare and keep a written record of all gifts accepted or offered, which will be subject to management review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy.

5. How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your line manager, director or the Head of Governance and Legal. If you feel you cannot raise it with any of the above, then please discuss with the President and or Chair of the Audit Committee and refer to our Whistleblowing Policy.

6. What to do if you are a victim of bribery or corruption

It is important that you tell your line manager or a director as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

7. Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report



another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. For further info, please view our Whistleblowing Policy

8. Training and communication

Training on this policy forms part of the induction process for all new employees. All existing employees receive regular, relevant training on how to adhere to this policy.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter. Please refer to the Bribery Act Statement – Appendix A

9. Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. For further info, please view our Whistleblowing Policy

10. Who is responsible for the policy

The Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Board has general responsibility on behalf of the organisation for monitoring the operation and effectiveness of our anti-bribery arrangements. The Managing Director has primary and day-to-day responsibility for implementing this policy and for dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

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

This policy does not form part of any employee's contract of employment and it may be amended at any time.

11. Related policies and procedures

- Code of Conduct



- Gifts and Hospitality Policy (see Code of Conduct)
- Employee Handbook

12. Date and frequency of review

This policy is to be review annually. The next review is due in December 2018.



Appendix A: Anti-Bribery Statement

The Bribery Act 2010 is arguably the toughest anti-bribery regime in the world. The Act imposes criminal liability on individuals and organisations in the event that employees, subsidiaries, agents or consultants pay or accept bribes in relation to the organisation's business anywhere in the world. The Directors are fully committed to ensuring that Premier Advisory Group operates as an ethical organisation. Bribery or corruption in any form will not be tolerated. We expect our employees, stakeholders, members and business partners to conduct business in a fair, honest and ethical manner at all times. **Premier Advisory Group prohibits** the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement.

- **to or from** any person or company, wherever they are situated and whether they are a public official or body or private person or company.
- **by** any individual employee, agent, member or other person or body acting on the PAG's behalf.
- **in order to** gain any commercial, contractual or regulatory advantage for PAG in a way which is unethical.
- **or in order to** gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

PAG recognises that market practice varies across the territories in which we do business and what is normal and acceptable in one place may not be in another. This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly declared and recorded:

- normal and appropriate hospitality
- the giving of a ceremonial gift on a festival or at another special time
- use of any recognised fast-track process which is available to all on payment of a fee
- the offer of resources to assist a person or body to make a decision more efficiently, provided that they are supplied for that purpose only.

Inevitably, decisions as to what is acceptable may not always be easy. If at any time you are in doubt as to whether a potential act constitutes bribery, the matter should be referred to a responsible person within PAG. The prevention, detection and reporting of bribery is the responsibility of each individual working on behalf of PAG. PAG operates a zero-tolerance approach to any attempts at bribery by, or of, its employees and associated persons and encourages all such individuals to report any suspected bribery activity to a responsible person within PAG. You will be fully supported if you make a report of suspected bribery in good faith even if, following an investigation, there is no finding that bribery took place. In the event of any bribery activity being suspected, PAG will carry out a full investigation and if any bribery activity is discovered, PAG may:



- in relation to employees, invoke its disciplinary procedures, which could result in a finding of gross misconduct and immediate dismissal, or
- in relation to Directors, refer the matter to the Shareholders.

If you have any concerns or queries in relation to this statement or your obligations, please make these known to a responsible person within Premier Advisory Group for advice.

