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Anti-Bribery & Corruption Policy

Gilbert Gilkes & Gordon Ltd.

Gilkes values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the Company's staff as well as others acting on the Company's behalf is key to maintaining these standards.

Scope

The policy applies strictly to all employees, directors, agents, consultants, contractors and to any other people or bodies associated with the Gilkes group of companies, within all areas, regions, and functions.

Understanding and recognising bribery and corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way in which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

Penalties

Offences under the Bribery Act 2010 by individuals are punishable by up to ten years imprisonment and/or an unlimited fine. If the Company is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it could face an unlimited fine.

A conviction of this nature would have severe reputational and/or financial consequences for the Company. We therefore take our legal responsibilities very seriously. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

Policy

Gilkes will not tolerate bribery or corruption in any form.

The Company prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or any other form:

- *to or from* any person or Company wherever located, whether a public official or public body, or a private person or Company;
- *by* any individual employee, director, agent, consultant, contractor or other person or body acting on the Company's behalf;
- *in order* to gain any commercial, contractual, or regulatory advantage for the Company in any way which is unethical or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

The policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- normal hospitality, provided that it complies with the Company's Corporate Hospitality & Gifts Policy;
- fast tracking a process which is available to all on the payment of a fee; and/or
- providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only.

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act may be in breach of this policy or the law, the matter should be referred to your line manager.

The Company will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy will be subject to disciplinary action which may ultimately result in their dismissal.

Key risk areas

Bribery can be a risk in many areas of the Company. Key risk areas include:

- **Excessive gifts, entertainment and hospitality** can be used to exert improper influence on decision makers. Gifts, entertainment and hospitality are only acceptable provided that they fall within the Company's corporate entertainment and gifts policies.
- **Facilitation payments and kickbacks** are used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement. The Company will not tolerate or excuse such payments being made.
- **Reciprocal agreements** or any other forms of 'quid pro quo' are never acceptable unless they are legitimate business arrangements which are properly documented and approved by management. Improper payments to obtain new business, retain existing business or secure any improper advantage should never be made or accepted.
- **Actions by third parties for which the Company may be held responsible** can include a range of people e.g. agents, contractors, consultants, acting on the Company's behalf. Appropriate due diligence should be undertaken before a third party is engaged. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorised and recorded.
- **Record keeping** can be exploited to conceal bribes or corrupt practices. We must ensure that we have robust controls in place so that our records are accurate and transparent.

Employee responsibility and how to raise a concern

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the Company. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this.

Any such incidents should be reported in accordance with the Company's Whistle Blowing Policy or directly to any Director or the Human Resources department.

If you are uncertain whether a particular act could be in breach of this policy, or you have any other queries or concerns, then you should raise them with your line manager.

Responsibility

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our Company control comply with it.

Management at all levels are responsible for ensuring their teams are made aware of and understand this policy and are given regular and adequate training on it.

This statement was approved by the Board of Directors of Gilbert Gilkes & Gordon Ltd on 01 Aug 2022.



Andy Poole MBA
Chief Executive Officer

02 Aug 2022