

## Anti-bribery & corruption policy statement

The partnership recognises its obligations under the Bribery Act 2010.

Troup Bywaters + Anders LLP strives to conduct our business fairly and honestly, prohibiting any inducement which results in a personal gain advantages to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of TB+A LLP or of the person or body employing them or whom they represent.

The action and conduct of all Partners and employees (collectively TB+A LLP personnel) as well as others acting on TB+A LLP's behalf are essential to maintaining these standards. To that end, all TB+A LLP Personnel, including consultants and contractors as well as suppliers must comply with this Anti Bribery Policy.

No bribes of any sort may be paid to or accepted from customers, suppliers, or representatives, private person or company. It is not permitted to establish accounts or internal budgets for the purpose of facilitating bribes or influencing transactions.

Bribes can take on many different shapes and forms, but typically they involve corrupt intent. This is where both parties will benefit.

This policy does not prohibit certain practices providing they are 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.

Certain activities are acceptable provided they fall within reasonable bounds of value and occurrence.

Prevention, detection, and reporting of bribery are the responsibility of all employees. Any suspicion of bribery must be reported. To protect identity, the whistle blower policy within the staff handbook can be followed; a copy is available on the intranet.

Signed:  Peter Anderson – Managing Partner

Date: 2<sup>nd</sup> January 2024