

## Anti-bribery, corruption & anti-competitive policy statement

The partnership will uphold all laws relevant to countering bribery, corruption and anti-competitive behaviour in all the areas in which we operate. We recognise our obligations under the Bribery Act 2010, the Competition Act 1998, the Enterprise Act 2002 (as amended by the Enterprise and Regulatory Reform Act 2013) and the Digital Markets, Competition and Consumers Act 2024.

Troup Bywaters + Anders LLP strives to conduct our business fairly, honestly and in an ethical manner, 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 employees, consultants and contractors as well as suppliers must comply with this Policy.


Individuals shall not engage in activities which are anti-competitive, including anti-competitive agreements either in writing or verbally, or working for competitor clients.

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. This and other aspects of anti-bribery are provided in greater detail within the employee handbook, along with the whistleblowing policy, which is also available on the intranet. This aims to encourage openness and offers support and protection to those who report genuine concerns of suspected wrongdoing.

Signed:  ..... James Campbell – Managing Partner

Date: 2<sup>nd</sup> April 2025 .....