

Anti-bribery, corruption & anti-competitive policy statement

The partnership is committed to upholding all applicable laws relating to anti-bribery, corruption, antitrust and fair competition in every area 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 conducts business fairly, honestly and ethically. We prohibit any inducement intended to improperly influence a decision, secure personal gain, or encourage action that is not solely in the interests of TB+A LLP or the organisation or individual being represented.

The actions and conduct of all Partners, employees, consultants, contractors and suppliers, together with anyone acting on TB+A LLP's behalf, are essential to maintaining these standards and must comply with this Policy.

Individuals must not engage in anti-competitive activity, including written or verbal agreements with competitors, bid-rigging, price-fixing, market-sharing, restricting output, or working for competitor clients where this creates a conflict or competition law risk.

Bribery is a form of corruption that can undermine fair competition. We expressly prohibit:

- + Bid-rigging: using bribes or kickbacks to win contracts, tenders, or influence procurement processes
- + Collusion with competitors: any agreement, formal or informal, with competitors to fix prices, divide markets, or restrict output, which may be facilitated by corrupt payments
- + Abuse of position: using a position within the company to improperly influence business transactions

No bribes of any sort may be paid to or accepted from customers, suppliers, representatives, individuals or organisations. Accounts or internal budgets must not be established for the purpose of facilitating bribes or improperly influencing transactions.

Bribes can take many forms and typically involve corrupt intent, where one or more parties seek an improper benefit.

This policy does not prohibit legitimate business practices, provided they are reasonable, proportionate and not intended to influence a third party, obtain or retain business improperly, reward business improperly, or secure favours or benefits.

Further guidance on acceptable activities and other aspects of anti-bribery is provided in the employee handbook. The whistleblowing policy, also available on the intranet, encourages openness and provides support and protection for those who report genuine concerns about suspected wrongdoing.

Any employee who suspects or witnesses improper behaviour must report it immediately to the People team. We encourage, and where required expect, concerns to be raised without fear of retribution.

Signed:  James Campbell – Managing Partner

Date: 15th July 2026