

Anti Bribery and Corruption Policy, Procedures and Guidance

It is Stride Treglown's policy to conduct all of our business in an honest and ethical manner.

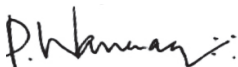
We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.

We will put in place procedures and guidance that will enable us to recognise and effectively counter risks from bribery and corruption.

Stride Treglown 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 if Stride Treglown 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.

The Policy Statement and our Procedures / Guidance have been approved by the Board of Directors of Stride Treglown. 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 Managing Director has responsibility for monitoring the use and effectiveness of the policy, dealing with any queries on its interpretation and actioning



Pierre Wassenaar (Chair)
3rd January 2023

improvements required to the Policy or Procedures.

Management at all levels are responsible for ensuring that those reporting to them are made aware of and understand this policy and are given adequate training on it.

Stride Treglown offer professional services under the appropriate professional codes of conducts of the bodies to which we are affiliated and all employees are expected to operate in a professional manner. We have assessed the main risk areas for our business as follows:

- When hospitality or gifts are offered by Stride Treglown or accepted by staff, issues may arise as to the distinction between reasonable UK practice within the professional services industry and a bribe.
- Purchase of goods and services by Stride Treglown particularly where they are not tendered.
- Awarding tenders on behalf of our clients to contractors / suppliers to carry out work on projects.
- Agents working on behalf of Stride Treglown may act inappropriately to further our interests.
- Payment of charitable / political donations may be construed as soliciting favours.

Our procedures address the risks of such activities and in addition we will take particular care to assess such risks each time we consider operating in new markets or enter into new business arrangements.



Darren Wilkins (Managing Director)
3rd January 2023

We will communicate this policy with suppliers and with employees through circulation of this policy and shall make it available to clients as appropriate in order to demonstrate this commitment. Stride Treglown encourages openness and will ensure that no one suffers detrimental treatment if they raise genuine concerns about Bribery or Corruption in good faith, even if they turn out to be mistaken.

Definition of Third Party

In this document, third party means any individual or organisation you come into contact with during the course of working for Stride Treglown, and includes actual and potential clients, consultants, contractors, sub-contractors, suppliers, distributors, business contacts, agents acting on behalf of Stride Treglown and professional advisers. It also includes government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Who is covered by the policy?

This policy applies to all individuals working at all levels and grades, including Directors, Regional and Divisional Directors, Senior Associates, Associates, Heads of Support Services and all other permanent members of staff. It also includes work experience trainees, staff seconded from other organisations, volunteers, casual workers, agency staff or any other person associated with us. It is immaterial whether the individual works in the UK or abroad they must comply with the requirements of the UK 2010 Bribery Act; they are referred to as staff members in this document.



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Your responsibilities

Staff members must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those staff working for us or under our control. All staff must avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Managing Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business.

Any staff member who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to immediately terminate our contractual relationship with agency / contract staff if they breach this policy.

What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. There are four key offences under the Act.

- Offering, promising or giving a bribe in the UK or Overseas. (Active Bribery)
- Requesting, agreeing to receive or accepting a bribe in the UK or Overseas. (Passive Bribery)
- Bribing of a foreign public official in order to obtain or retain business or a commercial advantage.

- Corporate liability for failing to put in place adequate procedures to prevent bribery whether actual or attempted by third parties and staff members associated with Stride Treglown.

Gifts and hospitality

This policy does not prohibit normal and appropriate hospitality given to and received from third parties.

The giving or receipt of gifts is not prohibited, if the following requirements are met:

- It is 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;
- It is given in Stride Treglown's name, not in a staff member's name and it is given openly, not secretly.
- It does not include cash or a cash equivalent (such as gift certificates or vouchers).
- It complies with local law and it is appropriate in the circumstances in terms of type, value and timing. For example, in the UK it is customary for small gifts to be given at Christmas time.
- Gifts must not be offered to, or accepted from, government officials or representatives, or politicians or political parties.

It is not acceptable for you (or someone on your behalf) to:

- Give; promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or

to reward a business advantage already given.

- Give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.
- Accept a gift, hospitality or payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them or will be provided by us in return.
- Threaten or retaliate against another member of staff who has refused to commit a bribery offence or who has raised concerns under this policy.
- Engage in any activity that might lead to a breach of this policy.

We appreciate that the market practice of providing hospitality and giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is acceptable practice within the UK professional services industry.

Stride Treglown has adopted the following underlying principles regarding acceptance and refusal of hospitality, gifts and donations together with the recording of such offers whether they be accepted or declined.

- No gift or hospitality other than modest working lunches and low value gifts such as calendars, diaries, pens should be accepted from any organisation currently tendering to purchase goods or services from Stride Treglown. In addition this includes any organisations that are providing a tender on behalf of our clients which we are involved in adjudicating / awarding.



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- Hospitality provided by Stride Treglown or received from an organisation that is in excess of £100 per head is to be approved by a main board director. Where it exceeds £200 per head it is in addition to be referred to the Managing Director for approval prior to offer or acceptance.
- Any gifts that appear to be worth more than £50 should not be given or accepted. Staff should exercise careful judgement in such cases and refer the matter to the Managing Director who will decide based on the origin and nature of the gift whether it should be refused or accepted.
- Offers from manufacturers / suppliers to offer goods or services free of charge or discounted below commercially viable rates for use by Stride Treglown or a staff member should be referred to the Managing Director who will decide if it needs to be referred to the Board of Directors for approval.
- We will not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices. No donation may be offered or made without the prior approval of a Director. Donations over £100 are to be referred to the Managing Director who will decide if it needs to be submitted to the Board of Directors for approval.

Record-keeping

The Hospitality Gifts and Sponsorship Register located on the Stride Admin drive, provides a written record of all transactions accepted, offered or refused, which are in excess of the guidelines stated in this policy. The register will be subject to internal and external audits under our IMS quality system.

We keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties. All accounts, invoices, documents and records relating to dealings with third parties, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

You must ensure all claims relating to hospitality, gifts or expenses incurred are submitted via Rapport and that it specifically records the reason for the expenditure.

Facilitation payments and kickbacks

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. These payments are typically small, unofficial payments made to secure or expedite a routine government action by an official. They are not usually paid in the UK, but are common in some other jurisdictions in which we operate. Staff members must avoid any activity that might lead to, or suggest, that a payment will be made or accepted by us.

If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Managing Director.

Managing Bribery and Corruption with Third Parties

Third Parties who work with Stride Treglown are expected to do so in an environment of mutual trust and recognition. Stride Treglown encourages third party organisations to maintain

and support Anti Bribery and Corruption policies and we will wish to satisfy ourselves that these are in place prior to working with them.

Stride Treglown will not engage with any third party whose policies are in our view inadequate or where research or information comes to hand that indicates the third party is not reputable or has been involved in practices that are inappropriate and contrary to the UK 2010 Bribery Act.

Stride Treglown encourages third parties to comment on and review our Anti Bribery and Corruption policy prior to working with us. If any third parties believe that there might be inappropriate practices occurring in any areas of our business we invite them to advise us of their suspicions via the Managing Director of Stride Treglown.

Stride Treglown reserves the right to immediately terminate the contractual relationship of any third party found to be in breach of the UK 2011 Bribery Act.

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, these should be raised with the Managing Director.

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

It is important that you tell the Managing 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.



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Protection

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Managing Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedures.

Training and communication

Training on this policy is part of the induction process for all new employees and other workers. All existing employees and workers will receive relevant training on how to implement and adhere to this policy. Additional training will be provided as appropriate thereafter.

Our zero-tolerance approach to bribery and corruption will be communicated to key suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

Monitoring and review

The procedures will be subject to regular internal and external audits via the IMS quality system to provide assurance that they are effective in countering bribery and corruption.

The policy and procedures will be reviewed annually by the Managing Director and the date of the next review is to be no later than the 3rd January 2019.