

## Anti-Bribery Policy

FixFirm operates with honesty, transparency and integrity and these ethics pervade all of our operations. In support of its commitment to maintaining the highest possible standards of business practice FixFirm's stance on bribery is one of 'zero-tolerance'. Bribery is illegal and as such has no place in our organisation.

### The Policy

In accordance with the Bribery Act 2010 FixFirm prohibits the following:

- the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement, regardless of size;
- to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company;
- by any individual employee, agent or other person or body acting on FixFirm's behalf;
- in order to gain any commercial, contractual or regulatory advantage for FixFirm in a way which is illegal/unethical;
- or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.
- This prohibition includes facilitation payments made to public officials for securing or accelerating routine processes and procedures.

### Interpreting the Policy

It is not the intention of the policy to prevent the following activities;

- Normal and appropriate hospitality.
- The giving and receiving of ceremonial gifts.

Such hospitality or gifts must be in moderation and not place any expectation on the recipient to reciprocate either in like or by performing, or failing to perform, any other task in return. If there is any doubt as to whether an action might constitute bribery the matter should be referred to a Partner of FixFirm.

### Preventing and Reporting Bribery

All FixFirm staff have a responsibility to prevent, detect and report bribery. Relevant guidance will be available to support all staff in fulfilling this duty.

Any suspicion of bribery or attempted bribery committed by or against an employee, agent or other party acting on behalf of the company must be reported immediately to a Partner of FixFirm.



Craig Haughton  
Managing Director