

## Anti - Bribery Policy

### MISSION STATEMENT

Topbond Plc recognises its responsibilities under the Bribery Act 2010, the Enterprise Act 2002 and other similar legislation. The Company is committed to running a professional business free from discreditable behaviour of any kind. It is particularly committed to Principle 2 of the Guidance given under the Bribery Act by the Ministry of Justice, that is, to prevent bribery by persons associated with it.

### Compliance Policy, Practices and Procedures

It is an offence under section 7 for a "relevant commercial organisation" such as the partnership to fail to prevent bribery. In this context it is liable if a person associated with it (a director, an employee, an agent) commits an act of bribery whether that person is prosecuted or not.

It is, however, a defence to any such criminal allegation to show, on a balance of probabilities, that the organisation nevertheless had adequate procedures in place to prevent persons associated with it from bribing.

In order to prevent the unwitting engagement in behaviour which might raise the suspicion of bribery and to prevent any associated person purporting to act on its behalf in a manner that brings suspicion on the directors and employees, the following measures have been adopted as appropriate and proportionate to the risks it faces. They will be enforced by their dissemination and disciplinary measures. Any resources that are required to implement any compliance measures are to be made available.

### MANAGEMENT

The responsibility for compliance of this policy rests with the Company Directors who will exercise oversight, make assessments of risk, deal with decisions where potential for bribery exists, receive and investigate reports of bribery and supervise the measures put in place to prevent bribery.

The daily overall responsibility for the compliance with the Bribery Act and the implementation of the policy rests with the Managing Director, and the Finance Director. They are to be consulted on any matter where the possibility of unlawful acts could arise.

The directors and employees shall report any attempt at bribery which comes to their attention, whether it consists of an approach to one of them or an act done by an associated third party. In the first instance the report should be made to the Managing Director, or the Finance Director.

Under no circumstances should a person who reports a suspicion of bribery be subject to victimisation for making a bon fide report, whether or not the suspicion turns out to be justified.

### ASSESSMENT OF RISK

The directors are governed by a strict code of conduct and the employees act upon instructions and are chosen for their integrity as well as ability. As such the general assessment of the risk of committing an offence under the Act is very low.

The risk of falling foul of a section 6 offence, of bribing a foreign official or of extra-territorial offences does not arise.

However



- In relation to occasions on which hospitality is offered or accepted by directors or employees issues may arise as to the line between a proper public relations exercise and intention to induce improper performance of a relevant function;
- In relation to awarding of contracts for services the Company has provisions for competitive tendering in place. However, as an additional requirement and as a requirement in awarding contracts which are not required to go out to tender, an issue of bribery might arise.
- In relation to charitable and political donations care should be exercised to avoid the suggestion of soliciting favours.
- The assessment of the firm's exposure to external and internal risks of bribery will be assessed annually.

## **HOSPITALITY**

In relation to hospitality, promotional expenditure which seeks to improve the image of the Company, to establish cordial and professional relationships and to maintain them is not unlawful if it is reasonable and proportional.

In order to make an assessment of any particular hospitality event which is to be offered to a client or prospective client the Managing Director will have to be supplied with information. This will include the cost and nature of the hospitality, the name and details of the person to be entertained and the purpose of the event. He will be required to approve the event or make suggestions for modifying it.

In the event that a director or employee is invited to an event a similar procedure should be followed.

## **CONTRACTS WITH CLIENTS**

No fees over and above proper professional fees agreed in advance for professional work done may be accepted. No payment may be made to the client for the award of a contract for services.

## **SUBCONTRACTING**

In subcontracting work no fee should be sought or accepted for awarding a contract to a subcontractor.

## **THIRD PARTIES**

A third party should be engaged to act on behalf of Topbond Plc in a manner consistent with this policy. The terms of engagement should be written down and refer to this policy.

Due diligence checks carried out on prospective contractors ought to include, where appropriate, an assessment of their ethical conduct.

## **CHARITABLE AND POLITICAL DONATIONS**

Donations of a charitable or political nature must be approved by a full director's meeting and be subject to a prior audit to ensure that there can be no suspicion that any advantage could be thought to accrue to the firm or any of its directors or employees.

## **COMMUNICATION**

A copy of this policy will be available on the public area of the Company's website. Reference will be made to it in the client care documents provided to clients, contracts with suppliers and agents.



## TRAINING

Where necessary staff employed by Topbond Plc and the directors themselves deemed will be required to undergo regular training in the terms of the Bribery Act and the requirements described in this document.

Any director or member of staff should be able to approach the Managing Director in absolute confidence in order to receive advice as to their conduct or to report a matter to concern which relates to bribery.

This policy will be reviewed annually for its continued effectiveness and suitability.

Signed:

A handwritten signature in blue ink, appearing to be "Glenn Springett", written over a faint grid background.

Managing Director

Glenn Springett

Date: 01-06-2021

Review date: 01-06-2022