

Anti-Bribery and Corruption Policy

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Bowmer + Kirkland, including any of its subsidiaries in which they have a controlling interest both in the UK and abroad, is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the firm's staff as well as others acting on the firm's behalf are key to maintaining these standards.

Bowmer + Kirkland takes bribery and corruption very seriously and anyone found to be violating this policy will be subject to disciplinary action, which may include summary termination of employment. We also encourage anyone aware of any suspicious activity that may violate this policy to report such activity to the company. Failure to report known or suspected violations may also lead to disciplinary action.

Bribery Act

The Bribery Act 2010 came into force in the United Kingdom on 1st July 2011 and applies to all actions of Bowmer + Kirkland in the UK, and those acting on behalf of the company anywhere in the world.

The Act introduces the following offences:

- The general offences of offering, promising or giving of a bribe (active bribery) and the requesting, agreeing to receive or accepting of a bribe (passive bribery);
- The offence of bribing a foreign public official in order to obtain or retain business or an advantage in the conduct of business;

- An offence which can be committed by commercial organisations which fail to prevent bribery committed on their behalf.

Under the Act businesses may be held responsible for the actions of persons associated with them, not just their employees. Employees therefore need to have confidence about those "associated persons" with whom and through whom we conduct our business.

Our Policy

All employees, consultants, contractors, agency workers, and any individual working directly for the company or any of its subsidiaries are required to operate within the following guidelines;

- To always act with honesty and integrity and support Bowmer + Kirkland's policy in relation to bribery and corruption,
- Not to offer or to make a bribe or incentive of any kind to anyone,
- Not to solicit business by offering any bribe or incentive to clients or potential clients,
- Not to accept any kind of bribe, incentive or inducement that would not be authorised by the company in the ordinary course of business,
- To refuse any bribe or incentive and to do so in a manner that is not open to misunderstanding or give rise to false expectations,
- To report and breaches of the policy, including if you suspect bribery and corruption is occurring or has occurred previously or if you are

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unclear on procedures or your responsibilities.

Employee Responsibility

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the firm. If you become aware or suspect that any activity or conduct, which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this. Any such incident should be reported to the Personnel Department or a Main Board Director.

All concerns raised will be treated confidentially without any risk of reprisal and all issues shall be thoroughly investigated. These actions are also supported through the company's Whistleblowing Policy.

Our policy does not prohibit normal and appropriate hospitality or gifts, given or received, providing that it is proportionate and would normally be authorised by the company. Where any element of doubt arises, appropriate authorisation must be received prior to the receipt or giving of any hospitality or gifts.

Anti-corruption Procedures

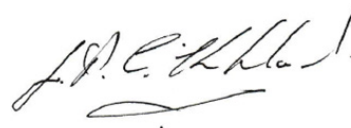
Under Section 7 of the Bribery Act 2010 procedures shall be in place to prevent persons associated with an organisation from committing bribery on their behalf. These procedures should reflect the level of risk attributable to bribery and

corruption within the business activities undertaken by an employee or an "associated person". These procedures to mitigate bribery risks should be informed by the principles set out in the Guidance Notes to the Bribery Act published by the Ministry of Justice.

Data Protection

When an individual reports suspected instances of bribery, the organisation will process any personal data collected in accordance with its data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the report of bribery.

Signed:



J A C Kirkland - Chairman
Date 1st January 2019