



## Anti Bribery Policy

It is our policy that the Partners and all employed by, or at, Architon LLP are compliant with the UK's Anti Bribery and Anti Corruption legislation and, as such, adherence to this policy is mandatory for all. If anyone fails for any reason to follow this Policy, it may result in disciplinary action being taken against that person which could result in their dismissal.

No one is to engage in activities which are contrary to UK Anti Bribery and Anti Corruption legislation, as anyone doing so could face up to 10 years in prison and/or an unlimited fine, whilst Architon LLP could also be liable to an unlimited fine and Government sanction.

This policy statement should not be regarded as exhaustive but does give examples of situations whilst setting out the rules and procedures to be followed. If anyone is, at any time, uncertain as to whether their actions will comply with this policy guidance must be sought from the Partners.

The UK's Anti Bribery and Anti Corruption legislation applies to all activities of a UK-based business no matter where they are carried out in the world. This policy therefore applies to ALL activities worldwide, whatever the local law, practice or custom may be.

This policy uses the following definitions: -

- Bribery is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust in the conduct of Architon's business.



- Corruption is the misuse of entrusted power for gain.
- Gifts are presents such as flowers, vouchers, food and drink. Event and travel tickets given to you as an individual are also gifts when they are not to be used in a hosted business context.
- Hospitality includes invitations to hosted meals, receptions and events for business purposes.

At all times the Partners and those employed by Architon LLP shall act in accordance with the following:-

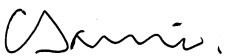
- Behave honestly, be trustworthy and set a good example;
- Use the resources of the Practice in the best interests of Architon LLP and do not misuse those resources;
- Make a clear distinction between the interests of the Practice and your private interests to avoid any conflict of interest and, if such conflict does arise, you should report it to the Partners immediately;
- Ensure that any community support, sponsorship and charitable donations do not constitute bribery and, if in doubt, you should consult the Partners;
- Confidentially report all incidents, risks and issues which are contrary to this policy to the Partners;
- Raise any issues regarding anti-bribery and anti corruption laws and the Practice Policies. Queries to be dealt with anonymously and a written response will be issued;
- Do not offer or accept bribes.
- Do not, without express prior written approval from the Partners, offer or accept any gifts or hospitality to or from clients, contractors, suppliers, other third parties or public officials.
- Do not offer money to any public officials in order to speed up service or gain improper advantage. This type of bribery is a 'facilitation payment' and is illegal. If you are faced with a demand for a facilitation payment you must actively resist the payment and immediately inform the Partners.

By complying with this policy we aim to ensure that all at Architon LLP will not at any time knowingly breach any relevant Anti Bribery and Anti Corruption legislation. By adhering to the Policy Architon LLP can also demonstrate that it has adequate procedures in place to prevent such activity.

It is mandatory for all employees to read this policy and that all new employees shall read this on their Day 1 induction.

All at Architon LLP have an independent obligation to prevent bribery and corruption and to ensure that any interaction with public officials complies with this policy document and relevant laws.

Signed:



C. Davis - Senior Partner  
For and on behalf of  
**Architon LLP**