



ANTI BRIBERY AND CORRUPTION POLICY

Hotchkiss expects its employees to demonstrate honesty, integrity and fairness in all aspects of their business dealings and exercise appropriate standards of professionalism and ethical conduct in all their activities. Hotchkiss expects the same approach to doing business from its business partners and suppliers and will not tolerate bribery or corruption in any form, adopting a 'zero tolerance' approach to any breach of this policy. Hotchkiss will also endeavour to raise awareness of the need to combat bribery and corruption with our business partners by publication of this Policy and support initiatives designed to reduce the risk of bribery and corruption.

Employees should note that it is a criminal offence to offer, promise, pay, request or accept a bribe. A bribe does not need to be a monetary sum - it can be any form of advantage, offered or received and a contract does not need to have been won for a corruption offence to have been committed. Similarly, a recipient does not need to benefit personally from a bribe.

However, this Policy is not meant to prohibit the giving or receiving of reasonable and proportionate gifts and hospitality subject to the following:

- They are appropriate and there is no risk or perception that they might improperly influence the recipient
- They do not contravene any rules applying to the individual to whom the hospitality or gift is offered (ie any policy that another organisation has in place)
- In the case of hospitality provided or received, it is intended to foster cordial relations or has legitimate marketing purposes; and:
 - the level of hospitality is appropriate with regard to the recipient and their organisation
 - there are no "add-ons" such as inappropriate overnight accommodation, travel costs, or sundry or lavish expenses
- In the case of gifts, these should never be cash and must be modest at all times, such as a token of appreciation, and where there is no risk of them being misconstrued as a reward, an inducement or other corrupt act
- All Sponsorship and donations made on behalf of the Company must be approved in advance by the Managing Director
- All offers of hospitality and gifts given or received must be recorded in a register maintained by the Managing Director

Inevitably, decisions as to what is acceptable may not always be easy. If any employee is in doubt as to whether a potential act could give rise to corruption concerns, the matter should be referred immediately to their line manager or director. Hotchkiss will ensure that any concerns are investigated appropriately and no employee making a report in good faith shall be penalised in any way for doing so.

Hotchkiss will take firm action against any individuals or other parties that it discovers are involved in bribery and any breach of the Policy by employees will be deemed gross misconduct and dealt with in accordance with our Disciplinary Procedure. In addition, Hotchkiss will abide by any Client bribery and corruption policies.

IF IN DOUBT, SEEK GUIDANCE

David Baldock
Managing Director
January 2018