

ANTI-BRIBERY POLICY (IN COMPLIANCE WITH THE BRIBERY ACT 2010)

It is Cass Hayward policy, which will be communicated to all employees and agents etc., to conduct all business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery. The senior management of the company and/or associated persons will carry out a periodic formal risk assessment of bribery annually and record their findings in clear practical terms proportionate to the risks identified. (See HCC form QPF 37).

This policy applies to all individuals working at all levels and grades, including partners, senior managers, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us.

A bribe is a financial or other advantage offered or given:

- To anyone to persuade them to or reward them for performing their duties improperly
- To any public official with the intention of influencing the official in the performance of his duties.

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must notify the company in respect of gifts and hospitality. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence them in the performance of their duties.

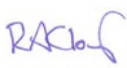
We do not make, and will not accept, facilitation payments or “kickbacks” of any kind. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us. We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties.

All expense claims relating to hospitality, gifts or expenses incurred to third parties must be approved prior to expenditure. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken. Internal control systems and procedures will be subject to audit under the internal audit process.

The responsibility for the implementation of this policy lies with the Partners

Signed: 
Partner (LLP Member)

Date: 03/04/2025