

BRIBERY PREVENTION POLICY

In accordance with the Bribery Act 2010 which comes into force on 1 July 2011, the LLP has to conform to legislation and deal with the risks of bribery.

The Act creates offences of offering or receiving bribes, bribery of foreign public officials and of failure to prevent a bribe being paid on an organisation's behalf. The Act also creates a new offence which can be committed by commercial organisations which fail to prevent persons associated with them from committing bribery on their behalf.

The new Bribery Prevention Policy is therefore being introduced to help to create an anti-bribery culture within the Practice and demonstrate a zero tolerance towards bribery.

It is important to note that the Bribery Act does not prohibit normal, genuine hospitality, promotional activities or other expenditure which purports to improve a business's standing with respect to image, products and services or relations.

As the Act also covers 'associated persons' it is important that all contractors and subcontractors are made aware of our Bribery Prevention Policy.

Rapleys LLP recognises that trust and confidence in the propriety of its activities is essential to its continuing success and growth. In order to foster the trust and confidence that clients, suppliers, Partners and staff have in the Practice, it is important that the Practice, the Partners and the employees behave appropriately and honestly at all times.

The Bribery Prevention Policy aims to:

- Protect the reputation of the LLP
- Protect Partners and employees from accusations of impropriety
- Ensure that all clients and suppliers are dealt with on an equal basis
- Avoid any potential conflicts between Partners' and employees' private interests and professional duties
- Instil a strong anti-bribery culture in the Practice and put in place a gift and hospitality monitoring process to further compliance with the Bribery Act 2010.

Partners and employees are advised that, notwithstanding anything contained herein, where there is any doubt over the permissibility or propriety of accepting a gift or hospitality offer they should decline that offer. Nothing should be donated or accepted which would bring the LLP into disrepute.

This policy applies to the Practice and to any associated persons as defined by the Bribery Act 2010.

Gifts

Save for gifts of low value and which are mere tokens (such as promotional pens, calendars and stationery), excluding money, Partners and employees of the LLP are not permitted to donate or accept any gifts from clients, suppliers or other third parties involved with the LLP.

The LLP recognises that there may be exceptional instances when refusing a gift will cause offence or embarrassment. In such cases the gift may be accepted and subsequently donated to a charity of the LLP's choice. Where practicable, any Partner or employee minded to donate, or accept, a gift should first seek approval from their head of department, Rod Bishop. If it is not practicable to gain prior approval, the donating or accepting Partner or employee should inform one of the above as soon as possible after donating or receiving the gift.

An accurate record must be kept of all gift offers made to the LLP, Partners or employees of the LLP by third parties, and must be filed in the Hospitality and Gifts Register which is kept by the QHSE Compliance Team. Any employee who is offered a gift which is not merely a token should record, as soon as is reasonably practicable:

- A description of the gift offered.
- An estimation of the value of the gift offered.
- Whether it was rejected or accepted.
- If accepted, why it was accepted.
- Whether prior approval was obtained, and if so, from whom.
- Who it is donated to.

Hospitality

Corporate Hospitality, for the purposes of this policy, is any form of accommodation, entertainment or other hospitality offered to a client or provided for a Partner or employee of the LLP by a third party and which is extended to the Partner or employee solely or significantly due to his position as a representative of the LLP. This excludes the following:

- Normal working lunches or refreshments provided during a business visit
- Hospitality extended to employees attending a Rapleys approved seminar, conference or other external event, provided that such hospitality is extended to all who are in attendance.
- Free seminars, talks or workshops provided that they are free to all in attendance and are not provided solely for employees of the LLP.

All Partners and employees are required to obtain approval before offering or accepting any form of corporate hospitality which is offered to them. Approval must be sought from their head of department, or where the value of the corporate hospitality is likely to be over £150, from Scott Hopper.

An accurate record must be kept of corporate hospitality offered to the LLP, Partners and employees of the LLP for entry on the Hospitality and Gifts Register. Any Partner or employee offered any form of corporate hospitality must record, as soon as is reasonably practicable:

- A description of the hospitality offered
- An estimation of the likely value of the hospitality
- Whether it was accepted or rejected
- If accepted, why it was accepted
- From whom prior approval was obtained

Compliance with this policy is essential to the protection of the LLP's reputation and that of its Partners and employees. Any Partner, employee or associated person who is found to have acted in contravention of this policy or its principles may be subject to disciplinary action, including summary dismissal where the breach amounts to gross misconduct.

Any Partner, employee or any associated person found giving or receiving bribes or bribing a foreign official will face criminal charges under the provision of the Bribery Act 2010. Anyone found guilty, will be responsible for bearing any related remedial costs such as losses, court fees or expenses.

Compliance Confirmation

Please take the time to read the new Bribery Prevention Policy and if you have any queries or concerns, please contact Scott Hopper or Helen Earwaker.

Please confirm that you have read and understood the Bribery Prevention Policy by signing below at your earliest opportunity. A copy of this will be retained on your personnel file.

I confirm I have read and understood the Bribery Prevention Policy.

Name:	
Date:	
Signed:	