



ANTI BRIBERY POLICY

Definitions:

Anti-Bribery Officer is the director in charge of anti-bribery matters - currently Steve Mangan.

Bribery is the receiving or offering/giving of any benefit (in cash or in kind) by or to any public servant or office holder or to a director or employee of a private company in order to induce that person to give improper assistance in breach of their duty to the government or company which has employed or appointed them.

Corruption is the misuse of entrusted power for private gain.

Company is Corbett & Co International Construction Lawyers Ltd.

Law Society is the Law Society of England & Wales or, where the Company uses external agents who are lawyers in other countries, the agents' own regulatory bodies.

POLICY STATEMENT

This document sets out the Company's policy in relation to bribery and corruption matters in the UK and abroad.

The Company conducts all of its business in an honest and ethical manner. **The Company has a zero-tolerance approach to bribery and corruption** and we are committed to acting professionally, fairly and with integrity in all our business dealings wherever we operate.

The Company and its directors, employees, consultants and all external agents shall:

- Not accept or offer bribes
- Behave honestly and ensure the standards required by the Law Society of a law firm and solicitor/lawyer are met.

- Report all incidents, risks and issues of concern to the Anti-Bribery Officer.
- Not accept without approval of the Anti-Bribery Officer any gift or hospitality over £250 in value from clients, suppliers, relevant third parties or public officials.

Not offer money or other benefit to any public officials to speed up service or gain any improper advantage. Must, if requested to provide a facilitation payment a) actively resist payment; and b) inform the Anti-Bribery Officer.

In addition the Company shall provide:

Top Level Commitment: The Company shall ensure that all employees, directors, consultants and other personnel are given the requisite training. The Company will also ensure that those who work for the Company understand that we do not tolerate bribery. We shall appoint an Anti-Bribery Officer, who shall be the person that any other director, consultant or employee may approach with concerns regarding bribery.

Monitoring & Review: The Company shall regularly review its Anti-Bribery Policy.

Due Diligence: The Company shall keep a log of all gifts or hospitality received or offered where the amount of the gift or hospitality is over £250. We shall require that those representing us (either as Consultants or External Agents) keep a similar log.

Risk Assessment: The Company shall, where entering into new markets, assess the risks of bribery.

Communication: The Company shall communicate its policies and procedures to staff and to others who will perform services for it. It shall also publish on its website the fact that it has a zero-tolerance Anti-Bribery Policy.