



Anti bribery and corruption policy

1. Introduction

We value our reputation and are committed to maintaining the highest standards in our conduct with you. The actions and conduct of the firm's staff as well as others acting on the firm's behalf are key to maintaining these standards. All employees and those acting for or on behalf of the company are responsible for conducting themselves honestly and professionally.

This document sets out the company's policy in relation to bribery and corruption. The policy applies strictly to all people or bodies associated with the Etta James Limited.

2. Understanding and recognising bribery and corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.: A 'gift' is any item of cash or goods which is provided for personal benefit at less than its commercial value. 'Hospitality' is food, drink, entertainment or other services provided for personal benefit at less than their commercial value.

3. Penalties

The Bribery Act 2010 came into force on 1 July 2011. Under that Act, bribery by individuals is punishable by up to ten years' imprisonment and/or an unlimited fine. If the firm is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could also face an unlimited fine.

A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for the firm.



4. Policy

We will not tolerate bribery or corruption in any form and is committed to a 'zero tolerance' approach to the making or receiving of bribes and other corrupt practices.

The Directors prohibits the making, offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- to or from any person or company wherever located, whether a public official or public body, or a private person or company;
- by any individual employee, director, agent, consultant, contractor or other person or body acting on the firm's behalf;
- in order to gain any commercial, contractual, or regulatory advantage for the firm in any way which is unethical or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit the normal hospitality provided it is recorded within the hospitality register and meets the criteria of this policy and is modest / proportional. Staff members may accept modest gifts, either themselves or on behalf of the Company, (e.g. chocolates or flowers) without reference to a director, as refusal could cause offence. If you are uncertain consult a director immediately. If in doubt refuse the offer.

It will be necessary to decline offers of hospitality or gifts exceeding the norm of conventional hospitality.

The following forms of gifts or hospitality, in particular, should be avoided:

- Inducements that could lead to a contractual position between the Company and a supplier, contractor or consultant;
- Substantial offers of social functions, travel or accommodation;
- Repeated acceptance of meals, tickets and invitations to sporting, cultural or social events, particularly from the same source;
- Particular care should be taken when offered any form of hospitality or gift from a person or organisation that has, or is hoping to have, a contractual relationship with the Company
- Staff should not accept any gift, reward or hospitality from any organisation or individual with whom they have contact in the course of their work as an inducement for either doing something or not doing something in their official capacity (it is particularly important to take care about any gift received from a person or organisation that has, or is hoping to have, a contract with the Company);

Should it be necessary to refuse hospitality a director should be advised and the matter recorded in the Gifts and Hospitality Register.

All Gifts and Hospitality must be recorded in the Gifts and Hospitality Register.



It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to a director.

James Morton will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

5. Key risk areas

Bribery can be a risk in many areas of the firm. Below are the key areas you should be aware of in particular:

Excessive gifts, entertainment and hospitality: can be used to exert improper influence on decision makers. Gifts, entertainment and hospitality are acceptable provided they are modest and proportional and do not exert improper influence on decision makers.

Facilitation payments: are used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement as of right. The firm will not tolerate or excuse such payments being made.

Reciprocal agreements: or any other form of 'quid pro quo' are never acceptable unless they are legitimate business arrangements which are properly documented and approved by management. Improper payments to obtain new business, retain existing business or secure any improper advantage should never be accepted or made.

Actions by third parties for which the firm may be held responsible: can include a range of people i.e. agents, contractors and consultants, acting on the firm's behalf. Appropriate due diligence should be undertaken before a third party is engaged. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorised and recorded.

Record keeping: can be exploited to conceal bribes or corrupt practices. We must ensure that we have robust controls in place so that our records are accurate and transparent.

6. Employee responsibility and how to raise a concern

We expect our employees, agents, consultants and business partners to act with honesty and integrity and fairness in all aspects of their business activities and exercise as a minimum the standards of professionalism and ethical conduct required by the Royal Institution of Chartered Surveyors of one of its members. This shall be the case whether or not the employee, agent, consultant and business partner is a member of the Royal Institution of Chartered Surveyors and subject to its bye laws and rules.



The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the company. Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage to a director. If you become aware

or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this to a director as soon as possible.

Etta James Limited is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion.

Etta James Limited