

# Bribery Policy

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**Issued February 2019**

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- 1.1 In keeping with our long standing Code of Conduct, Lichfields will not tolerate bribery in any form.
- 1.2 All members of staff should exercise the highest level of integrity in actions and relationships which may affect the company. No employee of the company should give, offer or accept a financial or other advantage to encourage anyone to perform their functions or activities improperly or to reward anyone for having already done so.
- 1.3 Given the nature of our profession and clients generally, wherein the vast majority of our work is carried out in the UK, we assess the risk of bribery in our business transactions to be relatively low. However, we will not be complacent.
- 1.4 The Board of Directors of Lichfields view this matter seriously, and any failure to uphold this standard will be a breach of the company's code of conduct. Such incidents would be handled under the company's disciplinary procedures and could lead to dismissal.
- 1.5 No transactions are allowed which result in a personal benefit to a member of staff as a result of a business relationship. No material personal gifts of any sort may be accepted by staff.
- 1.6 Entertainment by clients and business colleagues may only be accepted when that client or third party is present and only if it is of an appropriate and not overly lavish level.
- 1.7 Gifts to, or entertainment of, clients and business colleagues should follow the above guidelines and be of an appropriate nature, generally conveying a respect and a regard for the party or parties concerned, but not of a level which could imply any form of inducement to gain work or seek other influence or be interpreted as such by the scrutiny of any third party and as long as it is clearly understood that any such gift may not be reciprocated.
- 1.8 Our budget for client entertainment is reviewed and approved by the Board of Directors each year as part of our overall budget approval process, with special attention to any large scale items proposed. All such expenditure during the year must then be approved by budget heads with reference to the previously agreed budget.
- 1.9 This policy has been communicated to all staff and forms part of our induction pack for all new starters following its introduction and is monitored and updated as and when required.

Bruce McLeod

Finance Director

Nathaniel Lichfield & Partners Limited trading as Lichfields

February 2019