

**SARASIN UK GROUP
COMMITMENT TO
ANTI-BRIBERY &
CORRUPTION**

OCTOBER 2019



THE BRIBERY ACT 2010

The Bribery Act came into force in the UK on 1st July 2011.

Bribery is described as 'giving someone a financial advantage or other advantage to encourage that person to perform their functions or activities improperly or to reward them for already having done so.'

Sarasin UK Ltd ("The Group") acts with the highest standards of integrity and honesty in all it does and has a zero-tolerance approach to bribery and corrupt practices and will at all times operate fairly and transparently and act proportionately to comply with the Bribery Act 2010.

Corruption, bribery, and unfair or anti-competitive practices have a negative effect on the workplace and our business and the Company takes pride in its ethical approach to doing business and we insist on integrity from our employees and expect the same from all those we do business with.

The key offences are those of:

- Active bribery/passive bribery
- Bribing a foreign public official
- A commercial organisation failing to prevent active bribery by its employees, agents or subsidiaries

Bribery may include the offering, promising, giving, accepting or soliciting of a financial or other advantage as an inducement or reward for an action which is illegal, improper or a breach of trust. Corruption is the type of relationship brought about by bribery.

Bribery & corruption are very serious criminal offences that can result in unlimited fines and terms of imprisonment of up to 10 years for individual and unlimited fines for a company.

The law applies to bribes in the UK and abroad if the person is resident or incorporated in the UK.

The Group must be able to show it has 'adequate procedures' in place to prevent bribery being committed on its behalf.

A company will only have a defence to this offence if it can show it had 'adequate procedures' in place to prevent bribery. Also, the making of facilitation payments is prohibited under the Act. Facilitation payments are small payments made to secure or speed up routine actions, usually requested by public officials for issuing visas or permits, immigration controls or customs and excise checks. Sarasin & Partners expressly prohibits employees from making facilitation payments and claiming these on expenses as these are considered bribes and to do so is a criminal offence under the Bribery Act 2010

The Group has an effective policy and procedures to combat

bribery and corruption and all employees are responsible for ensuring that an anti bribery and corruption culture is adhered to at all times.

The Group's Code of Compliance, Compliance Manual, Code of Ethics and Business Conduct and Staff Handbook endorse the zero tolerance approach to bribery and corruption and set the standards to be applied to the conduct of the Company's business in general.

CONTRACTORS, SUPPLIERS AND INTERMEDIARIES

The Group is committed to taking all reasonable steps to ensure our stance on bribery and corrupt practises is communicated to all of our contractors, suppliers and intermediaries. Sarasin UK expects all of its contractors, suppliers and intermediaries to adopt a zero tolerance policy to bribery and corrupt practices, in particular Sarasin UK requires:

The contractor, supplier or intermediary shall at all times comply with all applicable laws, regulations and sanctions relating to anti-bribery including but not limited to the Bribery Act 2010.

The contractor, supplier or intermediary shall not engage in any activity, practice or conduct which would constitute an offence either by it or Sarasin UK under the Act.

The contractor, supplier or intermediary shall comply with Sarasin's anti-bribery policy in force from time to time.

The contractor, supplier or intermediary shall devise, implement and enforce written policies and procedures constituting adequate procedures under the Bribery Act 2010 in order to prevent commission by the contractor, supplier or intermediary of any offence under the Bribery Act 2010.

The Act can be found at

<http://www.legislation.gov.uk/ukpga/2010/23/contents>

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