

Anti-Bribery & Corruption Policy Statement

Leverton Clarke is committed to the highest standards of transparency, business conduct and ethics. It is our policy to conduct all business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all business dealings and activities wherever we operate.

We will uphold all laws relevant to countering bribery and corruption in any jurisdiction in which we operate. We remain bound at all times by the laws of England and Wales, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

A bribe can broadly be defined as the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal or a breach of trust. Bribes can take on many different shapes and forms, but typically they involve corrupt intent.

Employees and others acting for or on behalf of the Company are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments. As part of its anti-bribery measures, the Company accepts transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure, whether given or received.

A breach of these policies by an employee will be treated as grounds for disciplinary action, up to and including dismissal where the breach is considered to be serious or could be construed as gross misconduct. Employees and other individuals acting for the Company should note that bribery is a criminal offence that may result in imprisonment and or an unlimited fine for the individual and an unlimited fine for the Company.

Signed by



David Hicks
Chief Executive Officer
26 March 2020

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