

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. POLICY STATEMENT

- 1.1. Fitzrovian Capital Limited (the "Company") conducts all of its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.
- 1.2. This policy applies to all persons:
 - a) working for the Company, or on our behalf, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns and agents ("Company Staff"); and
 - b) any individual or organisation that comes into contact with us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties ("Suppliers").
- 1.3. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.
- 1.4. Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corrupt activities we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.
- 1.5. The purpose of this policy is to publicly communicate to Company Staff and Suppliers our position on bribery and corruption.
- 1.6. In this policy, third party means any individual or organisation that comes into contact with us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

2. IDENTIFYING BRIBERY AND CORRUPTION

- 2.1. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.
- 2.2. Corruption is the misuse of office or power for private gain.
- 2.3. We do not (nor do we procure someone) to:
 - a) give, promise to give, or offer, a payment, gift or hospitality with the expectation or



hope that a business advantage will be received, or to reward a business advantage already given;

- b) give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to “facilitate” or expedite a routine procedure;
- c) accept payment from a third party that we know or suspect is offered with the expectation that it will obtain a business advantage for them;
- d) accept a gift or hospitality from a third party if we know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- e) threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- f) engage in any activity that might lead to a breach of this policy.

3. FACILITATION PAYMENTS AND “KICKBACKS”

- 3.1. We do not make, and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official.
- 3.2. Kickbacks are typically payments made in return for a business favour or advantage. We avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

4. DONATIONS

- 4.1. We do not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices.

5. HOW TO RAISE A CONCERN

- 5.1. Suppliers are encouraged to raise with us concerns about any issue or suspicion of malpractice at the earliest possible stage. Any concerns or issues should be referred to Dominic Parker, Managing Director, on +44 (0)7880 334024 or DParker@Fitzroviaan.Africa

6. POLICY REVIEW

- 6.1. We will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness.
- 6.2. Company Staff members are invited to comment on this policy and suggest ways in which it might be improved by emailing feedback to the DParker@Fitzroviaan.Africa

