

Clan Partners Ltd (Clan Partners) expect persons under our control (and those of our Subsidiaries) to demonstrate integrity and respect in their business and personal activities. We will continually strive to demonstrate care, honesty, and fairness in all our dealings, with all our stakeholders. Clan Partners (and Subsidiaries) are committed to promoting and maintaining the highest level of ethical standards in relation to all our business activities. Our reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve these values. Clan Partners therefore has a Zero Tolerance Policy towards bribery and corruption and is committed to acting fairly and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems to counter bribery. In turn, Subsidiary organisations operating within Clan Partners are expected to apply the same stringent due diligence in their activities.

The Bribery Act 2010 (the Bribery Act) affects Clan Partners and our Subsidiary organisations in our business relations anywhere in the world.

All persons under the control of Clan Partners and our Subsidiaries are expected to adhere strictly at all time to the principles set out in this Policy.

This Policy Statement sets out the steps all of us must take to prevent bribery and corruption in our business and to comply with relevant legislation. It is aimed at:

- Ensuring compliance with anti-bribery laws, rules and regulations, not just within the UK but in any other country within which Clan Partners and/or our Subsidiaries may carry out our business or in relation to which activities our business may be connected;
- Enabling any Relevant Person to understand the risks associated with bribery and to encourage them to be vigilant and effectively recognise, prevent, and report any wrongdoing, whether by themselves or others;
- Providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with;
- Creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or corruption.

Any involvement in Bribery or corruption carries many risks to our purpose and strategic direction, equally, there are very clear benefits to acting with propriety. These include:

- Increased chances of being selected as a supplier in target sectors;
- Clan Partners and our Subsidiaries remain in good standing with our banks and our own Clients and Suppliers, and they will want to keep doing business with us;
- A business with high ethical standards is an attractive place to work.

All persons under the control of Clan Partners and our Subsidiary organisations are required at all times:

- Not to commit an offence listed within the Bribery Act;
- To comply with the Bribery Act and any other anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they or Clan Partners might conduct business;
- To act honestly, responsibly and with integrity;
- To safeguard and uphold Clan Partners' Corporate Values by operating in an ethical, professional and lawful manner at all times.

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a Bribe.

It is not acceptable to 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, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

All Relevant Persons are contractually required to take whatever reasonable steps are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected, potential risk of and/or actual cases of Bribery or corruption. Clan Partners is committed to taking appropriate action against Bribery and corruption. This may include either reporting the matter to an appropriate external government department, regulatory agency, or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

Clan Partners will keep disclosures confidential during any investigation it undertakes to the extent that this is practical and appropriate in the circumstances. Clan Partners will support anyone who raises genuine concerns under this Policy,

even if they turn out to be mistaken. Clan Partners is also committed to ensuring nobody suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting their genuine suspicion that an actual or potential bribery or corruption offence has taken place or may take place in the future or because they may assist in the investigation of an allegation of Bribery or corruption. Refer to our Whistleblowing Policy Statement for further details.

A breach of any of the provisions of this Policy by any Relevant Person who is an Officer or Employee of Clan Partners & Subsidiaries will constitute a disciplinary offence and will be dealt with in accordance with Clan Partner's Disciplinary procedure.

Breach of this policy by any Relevant Person who is an assignee or consultant or corporate entity could lead to the suspension or termination of any relevant contract, sub-contract or other agreement between the corporate entity and Clan Partners.



**Steven Dunbar**  
Clan Partners



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