



Anti-Bribery Policy

Updated October 2024

At Sewell Wallis, we're committed to ensuring professionalism, fairness and integrity in everything we do. We have a zero-tolerance approach to bribery and corruption, and expect all of our employees to help uphold this.

Purpose of this policy

The purpose of this policy is to ensure that everyone we work with, employees, candidates and clients, understand that they each have responsibilities to comply with anti-bribery laws, and to make sure no form of bribery or corruption ever occurs in our business activities.

Scope

This policy applies to everyone involved in our business - employees, contractors, consultants we work with, along with any other representatives working on behalf of Sewell Wallis. This applies regardless of the country they operate out of.

Definition of bribery

The term bribery in this context refers to offering, promising, giving, accepting or actively soliciting anything of value, as a means to influence the outcome of a situation to gain advantage. This includes, but isn't limited to:

- Cash payments
- Gifts or hospitality
- Kickbacks
- Favouritism when hiring or promoting current staff
- Donations

Our specific commitments

At Sewell Wallis, we are committed to:

- Acting in a professional manner, and practicing fairness and integrity with all of our business dealings and in all of our relationships
- Ensuring we have effective systems in place to counter bribery and corruption
- Complying with all applicable anti-bribery and anti-corruption laws, including the UK Bribery Act 2010.

Employee Responsibilities

Our whole team, and anyone working with them, needs to take responsibility for:

- Understanding this policy, and complying with it.
- Not engaging in any form of bribery, whether directly or through third parties.
- Reporting any suspected bribery or corruption immediately to their manager or a member of the Sewell Wallis management team.
- Making sure they have completed all required anti-bribery and anti-corruption training

Gifts and Hospitality

Gift giving and hospitality can be a legitimate part of building strong business relationships, but we can't use them to influence business decisions.. Any gifts that members of our team do receive that are disproportionate or inappropriate must be reported to the management team as soon as feasibly possible.

Due Diligence

Sewell Wallis will make sure we have conducted due diligence on any person, business or body we work with to ensure their activities comply with our anti-bribery and anti-corruption standards.

Monitoring and Review

This policy will be reviewed annually by the management team to ensure it is still relevant and is effective in line with any changes in legislation.

Non-Compliance

We believe it is important for everyone within the business to comply with this policy. Non-compliance with this policy may result in disciplinary action, including termination of employment or contract, and may also result in legal action.

Reporting Concerns

If you have concerns or suspicions of bribery or corruption occurring, we encourage you to report it to the management team. All reports made will be held confidentially , and we will ensure that nobody suffers any problems or consequences for reporting an issue in good faith.

Drafted 14/10/2024, H. Blakey