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| Title | Anti-Bribery & Corruption Policy | LEADERS Romans GROUP |
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| Owner | Group Risk & Compliance Director |
| Version Number | 1.0 |
| Primary Audience | All staff |
| Document Location | Intranet |
| Objective | To set out the minimum standards and controls to prevent acts of bribery or corruption |

1 Introduction

This is the Anti-Bribery & Corruption Policy (“Policy”) of The Leaders Romans Group Limited (LRG) and its group of companies (the “Group”) which sets out the Group’s policy on bribery and corruption.

There are three broad groups of offences related to bribery that the Group must avoid committing. In simple terms, these are:

- **bribing another person** (offering, promising or giving a financial or other advantage to another person to induce that person to perform improperly or to reward that person for the improper performance);
- **being bribed** (requesting, agreeing to receive, or accepting a financial or other advantage as an inducement to perform improperly or as a reward for performing improperly); and
- **failure to prevent** (a firm is guilty of an offence if a person associated with the firm bribes another person or is bribed in order to obtain or retain business or an advantage in the conduct of business). It is, however, a defence for a firm to have in place adequate procedures designed to prevent persons associated with the firm from undertaking such conduct.

2 Scope

This policy applies to everyone working for or associated with the Group, including, but not limited to, executive and non-executive directors, managers, employees, contractors and interim/temporary employees. This policy applies to all activities conducted by the Group including those outsourced to third parties.

3 Business Context

In condoning or failing to prevent bribery or corruption, the Group would fail to comply with bribery legislation and industry regulations.

Failure to comply with legislation, regulations and guidance designed to prevent bribery or corruption could have serious implications for the Group and/or its staff, and could result in; reputational damage, regulatory censure, financial costs, i.e. fines and litigation costs incurred by the Group or its employees; and/or imprisonment.

The Group must implement and maintain systems and controls designed to prevent bribery and/or corruption and will rigorously investigate any alleged instances. Disciplinary/legal action will be taken against any individual(s) involved in bribery or corruption.

4 Legal/Regulatory Context

Bribery is defined as “the giving or receiving something of value to influence a transaction”. The Bribery Act 2010 is the statutory instrument as laid before Parliament and contains the legal responsibilities placed upon individuals and firms.

The Ministry of Justice has provided guidance on procedures which relevant commercial organisations can put into place to prevent persons associated with them from bribing.

Bribery falls within the FCA's statutory objective of reducing the risk of financial crime and also impacts on our consumer protection objectives. The FCA Handbook SYSC 3.2.6R, 6.1.1R and 6.3 sets out the requirement for firms to establish and maintain effective systems and controls for compliance with applicable requirements and standards under the regulatory system and for countering the risk that the firm might be used to further financial crime.

This Policy and the supporting procedures have been designed to provide for compliance with anti-bribery legislation.

The Competition Act 1988 covers anti-competitive agreements, concerted practices and decisions by associations of undertakings which have as their object or effect the prevention, restriction or distortion of competition within the UK. Where firms enter into agreements (for example agreeing to restrict the advertising of fees) this is likely to be illegal and the penalties for firms and individuals can be severe.

5 Policy Statement

The Group expects the highest standards of professionalism, ethical conduct and standards of integrity from all of those captured within the scope of this policy. Specifically, staff must not:

- Offer, promise or give a financial or other advantage to another person to induce that person to perform improperly or to reward that person for the improper performance;
- Request, agree to receive or accept a financial or other advantage as an inducement to perform improperly or as a reward for performing improperly;
- Make or capitulate to wrongful demands or illegal payments or otherwise allow any unlawful payment to any person including but not limited to (agents, business partners or public officials whether in the UK or otherwise); or
- Make or receive any hospitality or gift which is disproportionate or excessive or which is otherwise improper (for details see the Gifts, Hospitality and Benefits Policy).

Charitable donations by the Group are permissible, so long as they are not made for the purpose of exerting improper inducement, wrongful advantage or undue influence.

6 Mandatory Requirements

6.1 Responsibilities

All staff must:

- Complete annual Anti-Bribery & Corruption training/testing as advised;
- Ensure compliance with the Gifts, Hospitality & Benefits Policy in relation to gifts, hospitality and/or benefits given or received; and
- Report any suspected or presumed incidents of bribery, corruption or other serious wrongdoing to their line manager or the Group Risk & Compliance Director (see Whistleblowing Policy for alternative ways of disclosing concerns in a confidential manner).

The Group Risk & Compliance Director must:

- Ensure the Group's Anti-Bribery & Corruption policy/procedures remain up to date and fit for purpose;
- Ensure that Anti-Bribery & Corruption training is fit for purpose and is delivered to all staff on induction and at least annually thereafter; and
- Provide technical advice and guidance to the business on Anti-Bribery & Corruption.

The Board has ultimate responsibility for ensuring that the Group has adequate procedures in place designed to prevent persons associated with the Group from bribing or being bribed.

Senior Management must:

- Actively support the prevention of bribery and corruption by ensuring that effective arrangements are embedded in their own business areas; and
- Ensure that bribery and corruption risks within the relevant business areas are reviewed regularly (at least annually).

7 Policy Application**7.1 Risk Based Approach**

The Group will establish and maintain a Risk Based Approach towards assessing and managing bribery and corruption risks to the Group.

7.2 Training

The Group ensures that all staff undertake appropriate anti-bribery training/testing on induction and at least annually thereafter.

8 Measurement of Effectiveness

The policy's effectiveness will be measured in a number of ways in order to ensure it is meeting its intended purpose. These include but are not limited to:

- Monitoring of issues and breaches in relation to Anti-Bribery & Corruption matters;
- Monitoring of complaints/whistleblows received in relation to Anti-Bribery & Corruption matters;
- Reports made to/received from Law Enforcement Agencies; and
- Audit and Compliance Monitoring outcomes.

9 Breach Reporting

Breaches of this policy must be reported to The Group Risk & Compliance Director.

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10 Review and Approval

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| Sign Off | |
| Paul Bartlett | April 2021 |
| LRG Board | April 2021 |
| Next Review Date | |
| This policy should be reviewed at least annually or when significant change occurs to the policy subject matter. The next scheduled review date for this policy is April 2022 | |

Version Control/History

| Version Number | Author | Effective Date | Status/Comments |
|----------------|---------------|----------------|-----------------|
| 0.1 DRAFT | Paul Bartlett | | |
| 1.0 | Paul Bartlett | 12 April 2021 | Final |
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