

Anti-Bribery & Corruption Policy Statement

Threepwood Consulting Limited is committed to carrying out its business honestly, fairly and above all in accordance with the law. Under the Bribery Act 2010, it is illegal to offer, promise, give, request, agree, receive or accept bribes. This policy will ensure legal compliance and help protect our business.

Our employees and agents, who act on our behalf, will be made aware of their individual legal responsibilities under the Bribery Act 2010 and that Threepwood Consulting will not tolerate bribery.

Our employees or agents will not:

- promise, offer or give any inducement or bribe to any client, official or third-party for improper conduct or to gain any unfair business advantage
- request, agree or receive any inducement or bribe from a client, official or third-party for improper conduct
- make any facilitation payments to officials for functions they are obligated to perform
- engage in any activity in breach of this policy

Any payment to a client or third-party shall be in respect of a legitimate service received by our business. Payments will be made from and into company bank accounts except for small purchases. Payments will not be made directly to individuals or into an individual's personal bank account unless there is a legitimate reason for this. Where any payment needs to be made to an individual, other than an approved supplier, then this shall be sanctioned by the Managing Director or nominated representative.

Any employee or agent who is believed to have offered a bribe or been involved in corrupt practices, in contravention of this policy, will be suspended immediately and subject to investigation by an appropriate officer of the Company. Any employee or agent subsequently found to have offered or received a bribe or to be corrupt will have their employment terminated, and may face a civil and criminal prosecution.

Hospitality and promotional expenditure will be proportionate, reasonable and appropriate for the business we carry out with our clients. Similarly, we will take steps to check and comply with our clients' rules for accepting hospitality and gifts.

Any employee or agent who suspects that a violation of the anti-bribery and corruption policy has occurred, shall report it to the Managing Director as per the guidelines in the company's Whistleblowing Policy.

Our Board will evaluate any risks of bribery before entering into any new business area or overseas market.

The Managing Director will ensure this policy is reviewed and updated, where necessary, on an annual basis as part of our Management Review process.



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Responsibilities

Overall responsibility for compliance with this policy shall be vested in Gary Eastwood, Managing Director. All employees and agents of the company will be individually responsible for ensuring correct procedures are followed and anti-bribery requirements are met in full.

Gary Eastwood
Managing Director

Document History

Version	Date	Amendment	Issued by	Authorised by
1	10/08/16	First issue	Gary Eastwood Managing Director	Ian Naylor Executive Director
2	16/04/20	Review and confirmed current	Gary Eastwood Managing Director	Richard Parke Executive Director
3	18/04/23	Review - updated prohibited activities, updated consequences, included reporting requirements.	Reinis Salna Financial Officer	Gary Eastwood Managing Director