

## Bribery and Corruption Policy

Lathams is committed to complying with all national and international bribery and corruption legislation, codes of practice and guidance, and to ensuring the honest and ethical behaviour of our employees and those affected by our business.

We ensure that all our staff comply with our Bribery and Corruption Policy, which requires them to:

- Behave honestly, be trustworthy and set a good example
- Use company resources in the best interests of Lathams and not misuse those resources
- Make a clear distinction between company and private interests to avoid any conflict of interest. If such conflict does arise report it to the Company Secretary immediately
- Ensure that any charitable donations do not constitute bribery and consult the Company Secretary if there is any doubt
- Confidentially report all incidents, risks and issues which are contrary to this policy to the Company Secretary
- Raise any issues regarding anti-bribery and corruption laws and the company's policies. Queries will be dealt with anonymously and a written response issued
- Never offer or accept bribes
- Never, without express prior written approval from the Company Secretary, offer or accept gifts or hospitality to or from clients, contractors, suppliers, other third parties or public officials. Gifts include flowers, vouchers, food and drink as well as event and travel tickets given to an individual when they are not to be used in a hosted business context. Hospitality includes invitations to hosted meals, receptions and events for business purposes

UK anti-bribery and corruption legislation applies to all activities of a UK-based business, no matter where they are carried out in the world. This policy therefore applies to all activities worldwide, whatever the local law, practice or custom may be.

All staff are responsible for complying with this policy and we will provide adequate time, money and other resources to ensure our legal obligations are met. We will also review this policy annually to ensure it always reflect the most current legislation and guidance.



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Managing Director

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