

Anti-Bribery Policy

Introduction

The Financial Conduct Authority places a responsibility on all regulated firms to consider and take steps to address the risk of bribery and corruption within their business, including where these risks come from third parties, which are also subject to the Bribery Act 2010.

The Directors of Euramax Solutions Limited are committed to ethical business practices, with the highest standards of integrity, and expects its employees, self-employed 'advisers' or 'consultants' and business partners to work to these standards.

This policy sets out your responsibilities as an employee ('employee' includes all personnel regardless of whether employed or self-employed) with the Company in relation to Bribery.

Bribery

The Bribery Act 2010, which came into force on 1st July 2011, sets out the circumstances in which individuals may commit an offence of bribery. Generally, these are:

- Offering a bribe
- Promising to pay a bribe.
- Giving a bribe
- Asking for a bribe
- Agreeing to receive a bribe.
- Receiving a bribe

In these cases, a bribe is a payment (or other advantage) given to a person with the intention that they will act in an improper way. For example, to encourage someone to award a contract to one firm over another or to overlook matters such as poor credit history when giving advice.

It is also an offence to give, offer, promise, ask for, agree to receive, or receive a payment as a reward for improper acts that have already happened. It does not even matter if the person who carried out the improper act understood that it was improper at the time.

Finally, it would also be an offence to act in an improper way if you thought you might receive anything, even if it has not been offered, and you have not asked.

We have a zero-tolerance approach to Bribery. If you are offered any kind of gift or payment you must report this to the Finance Team. Any gift, payment or hospitality valued at over £50 should be recorded in our Gift & Entertainment Register (*£50 has been discussed and agreed by the firm and its advisers as being a reasonable maximum value to accept without being constituted as an influencing factor. If in individual circumstances, you consider that a gift of lower value might not be proper then you should report this and seek further advice from our compliance officer*).



Often such gifts may be intended innocently, for example, relationship building, corporate away days, or a thank you from a third party where you were genuinely doing your job. It is essential, however innocent you think they are, to follow this policy to make it clear that you accepted the gift or payment in good faith.

Reporting Bribery

If you are offered a gift, hospitality, or any other kind of advantage that you think may be intended to influence you, or you suspect that another person may be engaged in any kind of bribery, you must report this immediately.

To report a suspicion of bribery please put together all the information that you have and send it to The Finance Director of the business.

If you are concerned about any repercussions of making a report then you should refer to the Whistleblowing Policy of the FCA for information on alternative methods of making a report. All notifications made will be handled with strict confidentiality. However, please note that there may be circumstances in which Euramax Solutions Limited are required to reveal an individual's identity, for example where The Company is compelled to do so by law and therefore anonymity cannot be guaranteed. All notifications relating to other employees within the Company will be handled in line with the Public Interest Disclosure Act 1998.

Subsequent Investigation

The Firm is committed to supporting regulators and law enforcement officers in the prevention of bribery and other financial crime.

All employees are expected to cooperate fully with any investigations; however, employees must also recognise that laws and procedures may apply to the disclosure of information and should therefore contact Ben Watson before disclosing information about customers or employees when contacted directly by law enforcement officers.

Failure to notify an appropriate person about criminal actions of which you are aware, in breach of this policy, may be a contractual breach leading to disciplinary actions.

Policy last reviewed December 2021.