



ANTI-BRIBERY POLICY

INTRODUCTION

Knights Brown conducts all business in an honest and ethical manner.

We have a zero tolerance approach to all forms of bribery and corruption. Knights Brown has a culture of ethical behaviour, and Knights Brown is committed to acting with integrity in all their business dealings. This is consistent with our obligations under the Bribery Act 2010.

This policy applies to all individuals working for the company or on the company's behalf in any capacity including directors, employees, officers, agency workers, agents, subcontractors, consultants and business partners.

RESPONSIBILITIES

The board of directors has overall responsibility to ensure that this policy complies with the company's legal obligations.

The compliance officer is responsible for implementing this policy, and for monitoring its use and effectiveness. The Finance Director undertakes the role of compliance officer as described in this policy.

Senior managers and directors are responsible for ensuring that those reporting to them understand and comply with this policy, and that they are given adequate training.

COMPLIANCE

The prevention, detection and reporting of bribery in any part of the company's business whether in the UK or abroad is the responsibility of all those working for the company and those working under the company's control.

Each employee is expected to conduct business honestly and be on guard against any conduct by other members of the company or by third

parties that is or appears to be corrupt in any respect. Any such concerns should be reported to your line manager or the compliance officer.

How to deal with the offer and acceptance of gifts and hospitality is dealt with below.

GUIDANCE FOR ACCEPTANCE OF HOSPITALITY & GIFTS

Hospitality and gifts must be:

- Modest
- Appropriate
- Transparent
- Recorded

Personnel must always avoid accepting or offering any hospitality or gift when it is on the hope that the company will receive a business advantage or to reward an advantage that has already been received.

All hospitality and gifts must be transparent. Where the value of the gift or hospitality is £100 or above (whether given or received), employees are required to disclose these to the compliance officer for approval. Such disclosure should be made by e-mail, confirming any details of the future gift/event, anticipated value and who it includes.

HOSPITALITY

Entertaining or being entertained by clients and contacts is not in itself prohibited, but it must be appropriate, modest and given and accepted in the context of our business. Lavish entertainment is prohibited. We have a marketing budget within which there is scope for corporate entertaining, incurring expenditure outside of this board approved budget should not occur.

Frequent entertainment of an individual employee by a third party and frequent



entertainment of the same client or contact by a member of the company are not permitted and should be reported.

GIFTS

Generally, gifts should not be offered or accepted unless the value and type of gift is clearly not a potential factor in any business decision. So for example, a gift of a company calendar or a pen with a company logo is acceptable.

If any valuable gifts are offered to any personnel, they must be reported to the compliance officer and along with the senior management, they will decide on how they are to be dealt with. A value gift is anything worth more than £100.

CASH AND FINANCIAL INCENTIVES

It is prohibited to solicit or accept any cash or financial benefit or assistance from any third party with whom the company may have a business connection. It is also prohibited to make any cash gifts or payments to third parties with whom you deal in relation to the company's business.

PERSONAL BENEFITS

It is not acceptable to have any dealing with a third party with whom the company has a business connection whereby you or a friend or relative might gain an advantage in return for some business advantage for that third party.



KEVIN VALENTINE | MANAGING DIRECTOR
JUNE 2020

DONATIONS TO POLITICAL PARTIES

The company does not make donations to any political party.

PROPORTIONATE PREVENTION PROCEDURES

Knights Brown is required to implement procedures that are proportionate to the bribery risks it faces, using the prevention procedures appended to this policy.

COMMUNICATION (INCLUDING TRAINING)

Within the company, all personnel must be made aware of the policy. Appropriate training is given as required.

BREACH OF THE POLICY

Any breach of this policy will be treated seriously and could constitute gross misconduct by an employee which may result in dismissal through the company's disciplinary procedure.

Where an employee, supplier, subcontractor or other person associated with the business are found to be in breach of the Bribery Act 2010, the company will report its findings to the Police. Furthermore, the Company shall immediately terminate its commercial relationship with any organisation in breach of the Bribery Act 2010.

ANTI-BRIBERY POLICY - APPENDIX

PREVENTION PROCEDURES FOR THE BRIBERY POLICY

RISK ASSESSMENT

Whenever the company considers a new venture with another organization or individual, a risk assessment must be undertaken as a first step, accompanied by due diligence on the prospective business partner.

DUE DILLIGENCE

Before entering into negotiations with third parties and before any letter of intent, commitment or contract is made with a third party, appropriate due diligence on that third party and the foreseeable related transactions should be undertaken.

COMMUNICATION (INCLUDING TRAINING)

Within the company, all personnel must be made aware of the ant-bribery policy. In addition, training on our anti-bribery policy and procedures will be given as appropriate.

If advice is needed on how to handle any particular situation, the compliance officer is the primary contact.

There may be circumstances when we find it necessary to contact the Serious Fraud Office (SFO) or other authorities, either for advice or to report a problem. Our compliance officer, probably with another member of the Board will normally handle any such situation.

MONITORING AND REVIEW

The implementation of this policy will be monitored by the compliance officer who will report regularly to the Board.

All cases involving bribery in the UK and overseas will be considered by directors.

All recommendations for changes to our policy – including these procedures – will be considered by the Board before being implemented.