

Procurement and Bribery Act policy

As an ethical business, we will not tolerate any impropriety in our dealings with third parties including for the avoidance of doubt bribery or corruption.

Staff should be aware that very serious criminal offences could be committed in respect of bribery and corruption.

Our firm and our staff must never offer or accept any improper payment or other benefit. Staff should be vigilant in considering not just their own knowledge of any proposed arrangement but also the perception.

Subject to the provisions of this policy, we require staff to avoid any payments or benefits passing between them and a third party where this cannot clearly be demonstrated as being proper. Namely, that such payment or benefit is properly offered:

- for services or goods provided;
- at a reasonable market rate for such services or goods;
- free from a conflict of interests; and
- entered into fairly, with selection of the provider of the services or goods being based on objective criteria and assessment of merit.

If any arrangements are being entered into owing to a close relationship such as an arrangement with a family member (over and above our standard discounts on certain of our legal services for staff members and their family) then you should inform our Money Laundering and Financial Crime Officer of this and follow the guidance provided.

Client hospitality, entertainment and gifts

While we are keen to ensure that our clients do not think of us as unwelcoming or abrupt, client hospitality, entertainment and gifts do represent a potentially significant risk in terms of other people's perception of our actions. For example, if we were to invite a key contact at a public authority to whom we have submitted a tender for new business away on a team bonding weekend at our expense, this may be perceived as having the potential to influence the client's decision about our tender. Therefore, this activity and anything of a similar nature is prohibited, however well intentioned.

Staff are encouraged to provide food and refreshments such as sandwiches over lunch meetings for example and tea and coffee for clients when they visit us. However, the food and drink provided should not be too lavish or otherwise of such a standard that it could be interpreted as our improperly trying to influence the client.

Similarly, we are keen for our staff to network and set up events at which we can spend time to build our relationship with the client. A seminar on legal developments at our offices which is free of charge for clients or potential clients to attend of itself would not, for example, be contrary to this policy and is encouraged. However, for any event in which we are likely to incur a significant expense such as tickets to a big sporting or music event, we ask staff to ensure that clients cover their own costs. In any event, please seek advice from our Money Laundering and Financial Crime Officer before inviting clients to a particular event and add the details to our centrally accessible log of gifts, entertainment and hospitality.

Broadly speaking we would ask staff to avoid giving gifts to clients. There may be circumstances in which it would appear rude or peculiar to not do so, in which case a small gift not exceeding £25 in value may be appropriate with the consent of our Money Laundering and Financial Crime Officer. Staff are asked to exercise their judgement in this respect however and seek advice from our Money Laundering and Financial Crime Officer if any gift is being made to a client. Any gifts should be offered openly and the details added to our centrally accessible log of gifts, entertainment and hospitality.

All entertainment and hospitality exceeding inexpensive refreshments should be refused without the authority of a partner of the business. In terms of gifts, if a client's gift to you exceeds £50 in value then the firm COLP should confirm whether it can be accepted. Our COLP will check the relevant provisions and seek advice if necessary. If the gift is less than £50 in value but clearly of significant value to the client then discuss this with your line manager and seek advice from the COLP if you feel this is necessary. Similarly, if the gift is less than £50 in value but you have concerns about how it might be perceived by others in the context of the role you are performing then it should not be accepted. Any gifts, hospitality exceeding basic inexpensive refreshments and entertainment accepted should also be recorded in our centrally accessible log of gifts, entertainment and hospitality.

Third party hospitality, entertainment and gifts

We generally discourage staff from accepting gifts from non-clients other than hospitality of the type which would be usual in the situation in question. For example, if you visit a third party's offices on client business for example and are offered a tea or coffee this would be quite normal hospitality. Gifts or other benefits accepted from third parties can however pose serious risks to you and to the firm and so should generally be avoided.

Please seek guidance from the supervising solicitor if you are in any doubt.

Record keeping

We maintain a log of gifts, hospitality and entertainment which is reviewed periodically by the supervising solicitor.