

# Anti-bribery and corruption: policy statement

Grant Thornton UK LLP (“GTUK”) does not tolerate any forms of bribery or corruption, either by our people or others who are associated with us. This applies to our work in the UK and overseas.

Bribery, as a form of corruption, is contrary to our Code of Conduct, which requires all our people to act without self-interest and with integrity. Our people must not facilitate corruption by others. To manage the risks associated with bribery and corruption our people are required to undertake due diligence on our clients and third-party relationships in accordance with the law and internal policy. Those providing services to us, or on our behalf, must also comply with the expectations outlined in our policy.

## Prevention of financial crime

As a firm we are committed to preventing financial crime. The firm has financial crime prevention policies, procedures and controls in place, together with governance and reporting arrangements, to ensure our people are supported in their obligations to prevent financial crime. The Money Laundering Reporting Officer (MLRO) and the Financial Crime Team provide expert support and oversight to the firm on the key financial crime risks: Anti-Money Laundering & Counter Terrorist Financing, Anti-Bribery & Corruption, Sanctions and Prevention of the Facilitation of Tax Evasion. Where possible financial crime risk is managed through a combined approach ensuring issues common across the risk areas are managed to best effect.

## Anti-bribery and corruption policy

Grant Thornton UK’s Anti-Bribery and Corruption (“ABC”) Policy is based on UK law, including the Bribery Act 2010 and requirements in other legislation, such as the Money Laundering Regulations 2017 and Proceeds of Crime Act 2002. However, the policy makes it clear that, where relevant, the laws of other jurisdictions must also be complied with. Compliance with the policy is mandatory for all our partners, employees, independent non-executives, secondees, and contractors. It also includes our majority-owned subsidiaries and any joint ventures that we control. Where we do not control a joint venture then the Grant Thornton UK representative must take steps to ensure that the joint venture adopts the policy as a model or adopts equivalent policies.

The ABC Policy and any related procedures are subject to oversight and ongoing monitoring by the firm’s financial crime governance arrangements.

## Key policy standards and requirements

The ABC Policy sets out the standards and requirements which must be adhered to. The key areas are:

- Our people, and third parties who work on our behalf, are prohibited from engaging in bribery, including making facilitation payments;
- Our gifts & hospitality policy sets out restrictions, including (but not limited to) financial limits, including specific restrictions in situations involving public officials and the prohibition of the giving or receiving cash or equivalents;
- It is prohibited to offer any advantage to public officials in order to influence them in their official role (whether that would be considered improper or not);
- We have a strict policy of not providing financial donations to political parties or individual politicians, as set out in more detail in the firm’s Lobbying Policy and Government Engagement Policy;
- Care must be taken in relation to charity donations to ensure they are not be used to conceal or facilitate bribes and must be in line with the firm’s approach to charitable donations and fundraising;
- Not offering or creating roles within the firm (including paid and unpaid work experience) where to do so would create unacceptable risks relating to bribery and corruption, or which would not be in line with the firm’s social mobility principles and its Work Experience policy. This includes not creating roles specifically for clients or known contacts of clients.

## Third parties

Third parties, which includes those who provide goods and services to us, or act on our behalf, are prohibited from engaging in bribery on our behalf. The firm’s Third Party Risk Management policy sets out the due diligence to be applied relative to the risks identified. Our people are also required to take appropriate steps to mitigate bribery risks throughout the third-party relationship.

## Whistleblowing

If anyone has concerns relating to bribery and corruption relating to our people, or our third parties, we encourage this to be reported to us via our confidential whistleblowing hotline on 0800 954 0043. Our whistleblowing policy can be found [here](#).