

# Anti-bribery and corruption statement

At Grant Thornton we do what's right, ahead of what's easy for our people, our clients and our firm. This distinguishes us and guides all of our decision making. Our Code of Conduct and Third Party Code of Conduct set out the expectations on our people and those working on our behalf. Our Anti-Bribery and Corruption Standard ('ABC Standard') sets out in detail what is expected in order to prevent bribery and report concerns and suspicious activity.

We are committed to preventing bribery and corruption and take a zero-tolerance approach to any activity which could involve breaches of relevant anti-bribery and corruption laws in the UK or abroad. This includes, but is not limited to, the UK Bribery Act 2010, the US Foreign Corrupt Practices Act, and relevant legislation in other jurisdictions where we operate.

We are signatories to the UN Global Compact, supporting principles with respect to anti-corruption, together with human rights, labour and the environment.



## Prevention of bribery and corruption

We have a Financial Crime Risk Management Programme in place that includes policies, procedures and controls designed to detect, prevent and mitigate financial crime risks, including bribery and corruption.

The Money Laundering Reporting Officer (MLRO) and the Financial Crime Team provide advice, guidance, as well as independent challenge and oversight, to the firm on financial crime risk management.



## Anti-bribery and corruption standard

Grant Thornton UK's Anti-Bribery and Corruption (ABC) Standard sets out the expectations on our people, and those working on our behalf, to prevent bribery and corruption.

Awareness and compliance with the Standard is mandatory for all our partners, employees, independent non-executives, secondees, and contractors. It is also mandatory for 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 Standard and any related procedures are subject to oversight and ongoing monitoring by the firm's strategic leadership team and financial crime governance arrangements.





## Key prohibitions and requirements

Our ABC Standard sets out the prohibitions and requirements which must be adhered to. The key areas are:

- It is expressly prohibited to engage in bribery either directly or via a third party. Bribery is defined as:
  - offering, promising, or giving, requesting, seeking, or accepting anything of value, or any other advantage
  - to improperly influence a business decision or any other act, inaction, or decision by any person
  - in any country.
- It is expressly prohibited to bribe a Public Official which is defined as:
  - offering, promising, or giving,
  - anything of value, or other advantage
  - to influence a Public Official in their role
  - in order to win or retain business or any other business advantage
  - in any country.
- Facilitation payments are prohibited (unless there is a genuine risk to life or wellbeing).
- Political donations and lobbying are prohibited.

### Gifts and hospitality ('G&H')

- All G&H must be given or received in line with our G&H Policy which is designed to address both bribery and independence risks and regulatory requirements.
- G&H must be proportionate, reasonable and only offered as part of building or maintaining good relationships. It must not create an expectation that the giver or recipient will do something in return.
- G&H must never be offered, given, or received, where it could influence, or be perceived to influence, a business decision or in circumstances where it would threaten Grant Thornton UK's independence, integrity or objectivity in any way.
- It is prohibited to offer or give any gifts to a Public Official.
- During a commercial negotiation with a client or supplier, G&H must not be offered, given or accepted by (a) the Grant Thornton team who are involved in that negotiation to/from the client or supplier, or (b) any other GTUK person who is aware of those commercial negotiations. It is, however, acceptable to provide/receive basic refreshments as a business courtesy.

### Charitable donations

- It is prohibited to provide a donation or sponsorship where that would influence, or could be perceived as influencing, a business decision by the person or organisation receiving it.
- The donation or sponsorship must be reasonable and proportionate, and only given to support the aims of the charity which should align with our purpose and values.
- It is also prohibited to provide donations or sponsorships where they coincide with a bidding process or contract renewal negotiations.

### Recruitment

- It is prohibited to recruit someone into a paid or unpaid role within our Firm where that would influence, or could be perceived as intending to influence, a business decision by a client or other relevant decision-maker (i.e. suppliers, public officials).
- It is not acceptable to create roles specifically for clients or known personal contacts of clients; for example, a client asks us to provide a work experience placement to one of their relatives.
- Where a candidate for a Grant Thornton role has a known personal connection to a client, or to the person proposing their onboarding ('the proposer'), then additional scrutiny must be applied to ensure that any recruitment is appropriate and in compliance with our ABC Standard and the law. This will require a risk assessment to be completed by the proposer and approval by our internal financial crime and ethics teams.
- Where individual contractors are specifically requested by clients to form part of Grant Thornton's engagement, and so the contractor is engaged with the client via ourselves, this arrangement must not improperly circumvent the client's own employment or procurement procedures.

### Engaging third parties

- Risk-based due diligence (Risk Assessment + Due Diligence + Contracting + Ongoing Monitoring) will be applied to all Third Party engagements in accordance with the Third Party Financial Crime Risk Due Diligence Standard.
- The objective of the due diligence process is to ensure we only engage with acceptable Third Parties to perform services on our behalf, and to take all appropriate steps to prevent the Third Party from committing bribery (and other financial crime) on behalf of our Firm. This includes individuals and legal entities that: (a) provide services for or on behalf of Grant Thornton, or (b) that provide goods, products and services to Grant Thornton.
- Other than in exceptional circumstances it is prohibited to engage a Third Party who is a Public Official, or any legal entity owned or controlled by a Public Official.



## Additional links

[Code of conduct](#)

[Third party code of conduct](#)

[Whistleblowing policy](#)

[Lobbying policy](#)



**Grant Thornton**

[grantthornton.co.uk](https://www.grantthornton.co.uk)

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