

Anti-bribery and corruption policy

Macgregor Smith is committed to complying with the UK Bribery Act 2010 across all business activities. The reputation of Macgregor Smith is one of our greatest assets and we will only be involved in lawful, ethical and honest business activities. We recognise that the risks from bribery are a growing concern in many countries across the world. Macgregor Smith is continuing to ensure that high ethical standards are maintained at all times and have implemented this policy to maintain an ethical trading position and to make sure there is no bribery or corruption within the company. All Macgregor Smith employees and those persons acting on behalf of Macgregor Smith are required to adhere to this policy and act in compliance with the UK Bribery Act.

The Company prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company by any individual employee, agent or other person or body acting on the company's behalf in order to gain any commercial, contractual or regulatory advantage for the company, in a way which is unethical or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

The Company recognises that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another. This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the Company or of the person or body employing them or whom they represent.

The UK anti-bribery and corruption legislation applies to all activities of a UK-based business no matter where they are carried out in the world. This policy therefore applies to all activities worldwide, whatever the local law, practice or custom may be.

By complying with this policy document we aim to ensure that our staff and the company will not at any time knowingly breach any relevant anti-bribery and corruption legislation and also that by adhering to the policy the company can demonstrate that it has adequate procedures in place to prevent such activity.