



Anti Bribery and Corruption Policy

Note: This should be read in conjunction with our other policies available on our website, under 'Quick Links' accessed from the footer menu.

Introduction

Fenton & Scott is committed to implementing and enforcing effective systems to counter bribery and to provide information and guidance on recognising and dealing with bribery and corruption. It is Fenton & Scott's policy to conduct all aspects of its business in an honest and ethical manner at all times.

Under the UK Bribery Act 2010 which governs our conduct both in the UK and worldwide, bribery and corruption is punishable for individuals by up to ten years imprisonment. If the Company is found to have taken part in the corruption or lacks adequate procedures to prevent Bribery, it could face an unlimited fine and be excluded from tendering for Government contracts.

Policy

The aim of this policy is to help the Fenton and Scott and its employees act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the Company's 'zero-tolerance' to bribery.

This policy applies to all staff, permanent, fixed-term or temporary staff employed by the Fenton & Scott, and any contractors, consultants or other persons acting under or on behalf of the Company.

Fenton & Scott will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make, or accept, "kickbacks" of any kind.

Fenton & Scott will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.



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Bribery

A bribe is an inducement or reward offered, promised or provided in order to bring about the improper performance by another person of a relevant function or activity.

Gifts and Hospitality

Fenton & Scott's Code of Business Ethics states that "Fenton & Scott employees, agents and other representatives are prohibited from giving or receiving money or gifts which could be construed as bribes." This policy does not prohibit normal and appropriate hospitality (given or received) to or from third parties.

From time to time, you may give or receive a gift that is meant to show friendship, appreciation or thanks to or from someone who does business with Fenton & Scott. Generally speaking, giving or accepting gifts of low monetary value such as corporate give-aways, consumables or other items of nominal value is acceptable provided you don't ask for the gift and as long as it does not influence, or have the appearance of influencing, your objectivity or decision-making. As a general rule, if accepting a gift could cause you (or a reasonable person in your position) to feel an obligation, don't accept it.

Employees must not:

- Accept any financial or other reward from any person in return for providing some favour.
- Request a financial or other reward from any person in return for providing some favour.
- Offer any financial or other reward from any person in return for providing some favour.
- Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.
- Retaliate against another employee or person working on behalf of or representing Fenton and Scott who has refused to commit a bribery offence or who has raised concerns under this policy.

Non-Compliance

All employees have a role to play in enforcing the policy and are required to deal with any observed or reported breaches. Should employees feel apprehensive about their own safety in regard to addressing any breach, they should seek senior management support.



Any member of staff refusing to observe the policy will be liable to disciplinary action in accordance with the Fenton & Scott's Disciplinary Policy up to and including dismissal.

Implementation of the Policy

Overall responsibility for policy implementation and review rests with the Fenton & Scott senior management. However, all employees are required to adhere to and support the implementation of the policy. Fenton & Scott will inform all existing employees about this policy and their role in the implementation of the policy. They will also give all new employees notice of the policy on induction to the Company.

Reporting

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Fenton & Scott or under our control. All employees and other Fenton & Scott representatives are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify management as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business, you should report this immediately. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

Protection Employees or those who are acting on behalf of Fenton & Scott who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. Fenton & Scott encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Fenton & Scott is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using your local HR Grievance Procedure.



Monitoring Policy

The policy will be monitored on an on-going basis, monitoring of the policy is essential to assess how effective Fenton & Scott has been.

Reviewing Policy

This policy will be reviewed and, if necessary, revised in the light of legislative or codes of practice and organisational changes. Improvements will be made to the management by learning from experience and the use of established reviews.