
Anti-Bribery and Corruption

This Policy outlines the commitment of Bailey Partnership to:

- undertaking its business activities without recourse to anti-competitive activity, bribery or corruption;
- fully complying with the applicable laws in all the jurisdictions in which we carry out business, including the Bribery Act 2010. (Revised in 2012)
- fully comply with the relevant Codes of Professional Conduct of the RICS, RIBA, ICE, CIAT, APS, APM and other professional bodies to which our staff belong and whose regulations we operate under.

Compliance

Anti corruption procedures will be kept regularly under review and compliance with latest requirements maintained by the appointed Compliance Partner, Simon Zawada, Partner. Day to day management and review of individual offices and staff therein will be the responsibility of the Compliance Manager, Yasmin Bourromane.

Competition

Principles

- We are committed to fair competition and honest, straightforward business dealings.
- We abide by antitrust and competition laws.
- We do not obtain competitor information by disreputable means.

We will:

- exercise caution when talking with representatives of our competitors to avoid even the appearance of anti-competitive practice; and
- seek advice from our legal advisors if we are uncertain as to how to proceed.

We will not:

- share the details of specific customer and supplier contracts or negotiations with our competitors, other customers or suppliers; or
- discuss prices, ongoing bids, terms and conditions of appointment, costs or profit margins with our competitors.

Principles

We are committed to conducting our activities in a wholly ethical manner, free from any form of bribery or corruption. We are committed to maintaining a high level of awareness among our employees, our suppliers and others with whom we do business of the latest rules and regulations relating to anti-bribery and corruption.

We comply with the applicable legislation on bribery and corruption wherever we operate and we cooperate appropriately with officials of the relevant government agencies.

We will exercise due caution when making charitable donations to ensure that they are appropriate and proportionate.

Bribery can be defined as ‘the receiving or offering of an undue reward to a public official or private individual in order to influence them in the exercise of their duty’.

Indirect bribery is when a payment is made via an intermediary (sub-consultants, suppliers etc)

We will:

- require any intermediaries acting on our behalf to comply with a code of ethics that is at least comparable to ours and to applicable laws;
- conduct thorough due diligence and only select intermediaries that meet our ethical requirements;
- only make payments to intermediaries that are proportionate, proper and legitimately due in relation to the services provided;
- ensure that internal controls are in place to prevent bribery and corruption; and
- ensure staff receive guidance and/or training as appropriate to prevent bribery and corruption.

We will not:

- offer, promise or accept, directly or indirectly, anything of value that could be construed as a bribe; and
- pursue business that requires us or to engage in unethical or illegal activity; and
- offer or make facilitation payments or similar inducements

Additionally, the Partners will:

- set a personal example in promoting honesty and integrity in their business conduct.

Gifts and Hospitality

Principles

We avoid gifts or hospitality that are lavish, when it might be reasonably regarded as a personal reward for the recipient and cannot be reciprocated.

We only accept modest gifts which are then distributed amongst our staff. Commercial hospitality where appropriate is accepted as a legitimate business activity to develop contacts and build team spirit, but only where appropriate and proportional.

We do not seek to influence government officials, departments or agencies through the provision of gifts, hospitality or other inappropriate means.

We are committed to understanding and adhering to the gifts and hospitality rules of our Clients and the relevant legislation.

We will:

- consider, before giving or receiving a gift or hospitality, whether it is legal, appropriate and proportional; and
- ensure we fully understand and comply with the requirements relating to gifts and hospitality when dealing with government officials.

We will not:

- offer or receive a gift of money or vouchers;
- accept a gift or hospitality if it is illegal or cannot be transacted transparently;
- accept a gift or hospitality if we believe it is being offered as an attempt to influence our decisions or create an expectation of inappropriate favourable treatment; and
- offer or receive entertainment that is inappropriate or offensive.

Additionally, the Compliance Partner / Manager will:

- ensure internal controls are in place governing the giving and receiving of gifts and hospitality.
- ensure that all staff receive an appropriate level of advice or training on gifts and hospitality.
- keep under review current business practices and relationship with public bodies.
- regularly review anti bribery policy.
- maintain internal monitoring procedures to deter and detect any breaches.

A handwritten signature in black ink, appearing to read 'Zanele'.

Signed Compliance Partner

Dated August 2018