

# iconium

## Iconium Anti-Bribery/Corruption Policy

August 2018

Iconium are committed to uphold the standards set out within the Bribery Act 2010. Our reputation is built on our values, the value of our employees and our commitment to act with honesty, integrity and trust throughout our organisation.

We condemn corruption in all its forms and we will not tolerate it in our business or in those that we do business with. The below is an outline of the considerations included, full details are available from David Lyon as required.

The 3 general bribery offences contained in the act are:

- The offence of bribing another person
- The offence of being bribed
- The offence of bribing a foreign public official

Bribery risks can arise in the following categories:

- Use of third Party representatives
- Gifts, entertainment and hospitality
- Facilitation payments

Steps we can take to avoid infringement:

- Risk assessment
- Due diligence
- Effective Monitoring and internal control

How concerns are raised:

All individuals have a responsibility to help detect, prevent and report instances not only of bribery, but also of any other suspicious activity or wrongdoing.

Should it become apparent that a corrupt act of some kind is being considered or carried out-either within the company, by any of our third parties or by any of our competitors, it will be reported to David Lyon for immediate action.

*Alex Lyon*

Alex Lyon

Partner

2/08/18