

The Anti Bribery Policy of HT Brigham & Co Ltd is as follows:

Brigham values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation.

Brigham is committed to conducting business in an ethical and honest manner and to implementing and enforcing systems that ensure bribery is prevented.

Brigham has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the world we operate.

Brigham encourages all its stakeholders, especially employees, to openly challenge, and report any breach of trust that may, or may appear, to exist. Anyone reporting such breaches can do so without fear of reprisal. All reports are fully supported by the Senior Leadership Team and will be met with the utmost confidentiality.

Brigham will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate – we are bound by the laws of the UK, including the Bribery Act 2010, with regards to our conduct both at home and abroad.

The Senior Leadership Team shall be responsible for anti-bribery and shall use its power as such to protect the company from any breach.

Brigham recognises that bribery and corruption are punishable by imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously. Any person breaching the trust of the company shall be liable to dismissal and may be reported to the appropriate authorities.

Brigham is committed to improving all its processes, including those positioned to prevent breaches of trust.

Signed:



Chief Executive

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