

## **Anti-Bribery Policy**

### **The Bribery Act and accepting gifts**

The Bribery Act 2010 which came into force on 1 July 2011 introduced significant new obligations on organisations to prohibit, and monitor for, improper payments. We are committed to conducting the business of the firm in an honest and ethical manner and, in particular, in accordance with the ten principles of legal practice which underpin the SRA Handbook. These include, most basically, a duty to uphold the rule of law (Principle 1).

It follows that we will never offer, pay or receive any improper payment, such as a personal cash payment or an inappropriate gift to an individual to place the work for their organisation with this firm.

### **Client entertaining**

Our policy on gifts and entertaining is that we continue to undertake appropriate client entertaining activity as part of our marketing policy, but this is never to be lavish or open to misinterpretation under this policy. To take a potential client out to lunch would usually be permissible, but to take them on holiday would not (unless they are close friends or relations in any event).

### **Gifts from clients**

Our policy on the receipt of gifts from clients or others is that there is a common-sense limit of £100, or a case of wine of any reasonable value, to any item received and in no circumstances may any representative of the firm accept any cash gift. Likewise, there is no objection to your being the recipient of client entertaining by others, as long as it is reasonable having regard to your role in the firm, your links with whoever is making any such offer and the value of what is being proposed.