

# Global Legal Policy

## Ethics and Anti-Bribery Policy Statement

### Purpose

The purpose of this policy is to ensure that BMT staff do not become involved in corrupt or unethical practices and that the third parties with whom we do business also act in an ethical manner. Appropriate business objectives associated with this policy are set, monitored regularly, and reviewed annually.

### Scope

This policy is applicable to all BMT employees and those people working on behalf of BMT.

### Policy Statement

BMT intends to follow sound ethical business principles and to ensure that strong anti-bribery controls are in place. I believe that a proactive approach to these issues is essential to our success. We adopt a zero-tolerance approach when confronted with unethical practices and work to prevent bribery and corrupt practices in all we do.

We will achieve the objective by:

- Providing exemplary leadership regarding ethical conduct
- Implementing controls to ensure compliance with the UK Bribery Act 2010, Modern Slavery Act and all applicable anti-bribery legislation in jurisdictions in which we operate. Compliance will be monitored
- Continuously improving our management of anti-bribery controls
- Providing funding and resources that ensure ethical practices are supported
- Providing appropriate information, training and supervision to ensure personnel can undertake their work ethically
- Identifying bribery and corruption risks and taking appropriate action to mitigate them
- Promoting fair employment practices, and ensuring our supply chain does the same
- Implementing arrangements for managing issues as they arise and encouraging staff to raise concerns
- Ensuring that employees who raise concerns are treated fairly and with respect
- Setting clear targets which are monitored regularly and reviewed
- Providing an effective process of assurance.

### Responsibilities

It is the responsibility of every individual to:

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- Comply with this policy and to ensure that our ethical standards are shared by our clients, agents and supply chain
- Perform his or her job in an ethical manner
- Raise concerns if unacceptable situations rise
- Comply with all anti-bribery procedures and ethical standards
- Make ethical conduct personal and look for continuous improvement.

Non-compliance with the policy may result in disciplinary action. Actions contravening anti-bribery laws will be reported to the authorities.

One of BMT’s greatest strengths comes from our commitment to act with integrity and in accordance with any relevant legislation. We aim to be trusted to solve the most complex of our clients’ issues while continuing to exemplify a proactive ethical culture and promoting a fair and equitable world.



Sarah Kenny  
 Chief Executive  
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