

## Anti-bribery - statement of personal support from the Board

Stephensons is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on Stephensons behalf is responsible for maintaining the Firm's reputation and for conducting company business honestly and professionally.

Stephensons considers that bribery and corruption has a detrimental impact on business by undermining good governance and distorting free markets. Stephensons benefits from carrying out business in a transparent and ethical way and helping to ensure that there is honest, open and fair competition in the profession.

Stephensons does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, partners, agents, or consultants or any persons or companies acting for it or on its behalf. The board and senior management are committed to implementing and enforcing effective systems throughout the Firm to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

Stephensons have issued a new anti-bribery policy outlining the Firm's position on preventing and prohibiting bribery which can be viewed on the Intranet. The anti-bribery policy applies to all employees, as well as agency workers, consultants and contractors. Everyone acting for Stephensons is required to familiarise themselves and comply with the Firm's anti-bribery policy with immediate effect.

Anyone acting for or on behalf of Stephensons is strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.

As part of its anti-bribery measures, Stephensons is committed to transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure. Such expenditure must be authorised in advance, in accordance with the procedures set out in the anti-bribery policy.

A breach of the anti-bribery policy by an employee will be treated as grounds for disciplinary action, which may result, in extreme cases, in a finding of gross misconduct, and immediate dismissal. Bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the Firm.

Stephensons will not conduct business with service providers, agents or representatives that do not support our anti-bribery objectives. Stephensons reserves the right to terminate its contractual arrangements with any third parties acting for, or on behalf, of the Firm with immediate effect where there is evidence that they have committed acts of bribery.

# Stephensons

legal services the way you want them

The success of Stephenson's anti-bribery measures depends on everyone playing their part in helping detect and eradicate bribery. All employees and others acting for, or on behalf of Stephenson's are encouraged to report any suspected bribery in accordance with the procedures set out in the anti-bribery policy. Stephenson's will support any individuals who make such a report, provided it is made in good faith.

THE BOARD