

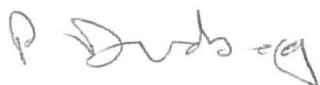
## Anti-Bribery and Anti-Corruption Policy

It is the policy of Sir Frederick Snow and Partners Ltd, Snow Consulting Ltd and Sir Frederick Snow (International) Ltd to comply with all UK anti –corruption legislation including (without limitation) the Bribery Act 2010, and also to comply with all applicable anti-corruption legislation in other countries in which we work.

This policy has been formally adopted by the Board of Directors of each company, and Simon Smith, a Director of the companies, is responsible for its implementation. The effectiveness of this policy and the procedures flowing from it will be reviewed at intervals not exceeding 12 months.

An anti-corruption risk assessment has been made of the firms’ businesses and a Code of Compliance has been established. Members of staff have received training regarding this Policy and the Code of Compliance and failure to comply with them is a disciplinary offence. As part of this Code of Compliance, a register of gifts and hospitality given or received is being maintained.

Staff, clients and any other persons or organisations with whom we have contact are encouraged to raise any concerns regarding bribery or corruption in confidence with any of the Directors, who will arrange for a full investigation of all such concerns. The companies will take all reasonable measures to ensure that no member of staff who raises genuine concerns in good faith will suffer detriment in their employment as a result of doing so, and that other persons or organisations raising such concerns will not suffer any detriment as a result of actions by the companies.



Paul Drobig  
Managing Director

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