

This document sets out the PWM UK Ltd policy in relation to preventing bribery, corruption, fraud and anti-competitive behaviour.

The Bribery Act 2010 applies to UK and international organisations and UK individuals. The Act also targets overseas corruption by organisations that have a connection with the UK.

The Act sets out two general offences of bribing and being bribed, which are committed when someone:

- Offers, promises, or gives another person a bribe (so-called “active bribery”).
- Requests, agrees to receive, or accepts a bribe (so-called “passive bribery”).

A bribe is described as the provision of a financial or other advantage in connection with a person performing a function “improperly”.

A corporate offence is where a commercial organisation or associated person fails to prevent persons performing services on its behalf from committing bribery. This company would be guilty of this offence if the person who performs a service on behalf of the organisation bribes another person intending:

- to obtain or retain business for the company.
- to obtain or retain an advantage in the conduct of business for the company.

The organisation and its directors are committed to the prevention of bribery by those employed and associated with it. The organisation is committed to carrying out business fairly, honestly, and openly, with zero-tolerance towards bribery, corruption, and fraud.

This is achieved by:

- carrying out a periodic risk assessment to ascertain the risk of bribery,
- instigating procedures proportionate to that risk,
- having good internal controls and record keeping,
- securing the commitment of directors, managers and all staff to the prevention and detection of bribery,
- developing a culture in which bribery is unacceptable,
- undertaking due diligence procedures proportionate to the assessed risk of bribery,
- effectively communicating the anti-bribery policy to all staff,
- training all employees to recognise bribery so that they can avoid it and be alert to possible instances of bribery,
- monitoring and reviewing the effectiveness of the bribery procedures and updating them as necessary to ensure that they remain effective.

This policy is communicated to all employees and other interested parties.



Alex Murphy
Managing Director
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