

Anti-Bribery and Corruption Policy

Introduction

It is Gerson Relocations policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

Our Anti-Bribery and Corruption policy is clear and we support our employees and others acting on the company's behalf to make decisions in-line with our policy.

This methodology applies to all our employees, directors, consultants, contractors, agents or other person or body acting on our behalf, and extends to all our business dealings and transactions in all countries in which we or our agents operate.

We take care to ensure we only do business with suppliers and partners who share our values and agree to act consistently with this policy.

It is our policy to comply with the UK Bribery Act (2010) and all other bribery and corruption laws in the countries where we do business.

Who must comply?

This policy applies to anyone who is employed by, or performs services for, or on behalf of Gerson Relocation Ltd, anywhere in the world, in any capacity, including consultants, contractors or agents.

Any persons employed by, or performing services for, or on behalf of Gerson Relocation outside the UK must comply with local bribery and corruption laws as well as this policy.

Gerson will require its business partners to comply with this policy and the associated guidance in all their dealings with or for Gerson.

Bribery and Corruption

It is illegal to give or receive a bribe under the Bribery Act 2010 and organizations are liable for bribes taken or given on their behalf where they do not have adequate procedures in place.

Bribery is the offering, promising, giving, accepting or soliciting of money, a gift or other advantage as an inducement to do something that is illegal or a breach of trust in the course of carrying out an organization's activities.

Corruption is the misuse of public office or power for private gain; or misuse of private power in relation to business outside the realm of government.

"The attention is in the detail"



What is a Bribe?

A bribe is an inducement or reward which is offered, promised or provided in order to gain improperly any commercial, contractual, regulatory or personal advantage:

- to anyone to persuade them to or reward them for performing their duties improperly or:
- to any public official with the intention of influencing the official in the performance of his/her duties

The bribe can be made direct or through a third person. It is still an offence to make a bribe, even if it is turned down or fails to have the intended effect, and is a breach of trust.

If any instance of bribery or corruption is identified, we will take corrective steps immediately.

Gifts and Hospitality

Giving and receiving ordinary and usual business hospitality and entertainment and promotional or other business expenditure which seeks to improve the image of the company and its services or to establish or cement cordial relations is recognised as an established part of doing business. Our company's policy **does not** prohibit reasonable and proportionate hospitality and promotional or other similar business expenditure (offered or received) intended for any of the foregoing purposes.

This policy **does** prohibit the offer or receipt of gifts, hospitality or expenses whenever they could influence or be perceived to be capable of influencing the outcome of a contractual or material business transaction. This may be the case if timed around particular business decisions.

Facilitation payments and kickbacks

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest that a facilitation payment or kickback will be made or accepted by us.

Donations

We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

Record Keeping

- We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties
- All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our expenses policy and specifically record the reason for the expenditure
- All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and

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maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

Raising Concerns

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

Monitoring

The effectiveness of this policy will be regularly reviewed by the Board. Internal control systems and procedures will be subject to audit under internal audit process.

Conclusion

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected concerns or wrongdoing to their line Manager or Director.

Failure to comply with this policy may result in disciplinary action, including dismissal (employees), or appropriate sanctions (business partners) in addition to civil or criminal charges.

This policy has been approved and adopted by the Board of Gerson Relocation Ltd

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