

Barnett Waddingham Anti-Bribery Policy Statement

HOWDEN

Owner: Governance – Matthew Springham

Approved by: Head of Risk - Nicola Raeburn

SMF Owner: Rob Byett

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Version: V1.0

Applicability: All

01 Purpose

This Policy Statement sets out Barnett Waddingham's position regarding anti-bribery and our position about how we conduct business.

This policy remains in effect pending transition to the Howden Group policy framework. A formal integration programme is underway, and this policy will be updated or replaced in due course. Until then, all provisions remain fully applicable.

02 Scope

This policy applies to individuals working for or on behalf of Barnett Waddingham within Howden UK&I Retail Division within the Howden Group ("the Firm"). This includes, without limitation, directors, officers, senior managers, employees (regardless of whether they are permanent, fixed term or temporary) consultants, contractors, seconded staff, trainees or any other person engaged on a basis consistent with employment. ("Employees").

03 Policy Statement

The Bribery Act 2010 (the Act) introduced individual and corporate crimes, including “failure to prevent” bribery, which we fully endorse as a good business practice.

We maintain a zero-tolerance approach to bribery and corruption. This is underpinned by a framework of policies, procedures, and controls, reinforced through regular employee training, including but not limited to:

- Anti-bribery policy statement;
- BW Code of Ethics
- Conflicts of interest
- Restricting the giving and receiving of gifts and hospitality;
- Keeping accurate and detailed records of all financial transactions;
- Monitoring the risks we face and updating the appropriate systems and controls;
- Responding to all reports of actual or potential illegal activity;
- Reporting actual and potential instances of bribery and corruption to the relevant authorities;
- Fraud policy;
- Authorities and expenditure policy
- Personal investment, shares and market abuse

Our Values

We are committed to carrying out business fairly, honestly and openly, and we do not tolerate bribery in any form. We may take action to cease relationships with those that involve themselves in bribery where we consider it would be inappropriate to continue the relationship.

The implementation of anti-bribery procedures is not simply to meet our legal obligations, but also to promote good ethical behaviour and reliability, which is tantamount to limiting our exposure to bribery. This document, therefore, outlines clearly our anti-bribery stance, which is embedded within our corporate culture.

Policy

We take the prevention of bribery very seriously and do not endorse or condone bribery. All staff, consultants, contractors, and any individuals associated with us **must not directly or indirectly:**

- Offer, give, solicit or accept any bribe, either in cash or any other form of inducement, to or from any private individual or company, whether or not, acting in the capacity of a public official or agent, wherever they are located; in order to:
 - gain any commercial, contractual or regulatory advantage for Barnett Waddingham in a way which is unethical;
 - gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected to the individual.

All those to whom this policy applies must ensure that any third party which is undertaking business for or on our behalf must also comply with this Policy or maintain equivalent standards and safeguards to prevent bribery and corruption.

The image features the 'HOWDEN' logo in a bold, blue, sans-serif typeface. The logo is positioned on the left side of the frame, partially overlapping a large, light teal circular shape that originates from the left edge. The background is a solid light teal color, which is accented by two smaller, darker teal rectangular shapes on the right side, one in the upper right and one in the lower right. The overall design is minimalist and modern, using a monochromatic teal color palette with varying shades and geometric forms.