

Anti-Bribery and Corruption Policy

20 May 2013

Introduction

Pakenham Partners Limited values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy;
- Training all consultants and clients, so that they can recognise and avoid the use of bribery by themselves and others;
- Encouraging its consultants and clients to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Notifying all third parties that the Company engage with of its policy and zero tolerance of bribery and/or corruption;
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery.

The Policy

Pakenham Partners Limited prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement

- *to or from* any person or company, wherever they are situated and whether they are a public official or body or private person or company
- *by* any individual consultant, agent or other person or body acting on the Company's behalf
- *in order to* gain any commercial, contractual or regulatory advantage for the Company in a way which is unethical
- *or in order to* gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual

Further Clarification

The Company recognises that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another. This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the Company or of the person or body employing or contracting with them or whom they represent.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded

- normal and appropriate hospitality
- the giving of a gift for a corporate reason or at another special time, as long as reported in the proper manner within the firm on the gifts register

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the local senior manager with responsibility for this policy before proceeding. If necessary, guidance should also be sought from the Compliance Officer of our Principal

Principles Responsibility within Pakenham Partners Limited

The prevention, detection and reporting of bribery is the responsibility of all representatives of the Firm. Suitable channels of communication by which anyone can report confidentially any suspicion of bribery will be maintained via the Anti-Corruption Reporting procedures.

Useful resource: www.transparency.org.uk for the Transparency Index

A fuller Policy and Procedures outlining all the Principals of the Act can be requested

From the Compliance Officer of the Firm by emailing kowerkowicz@pakenhampartners.com