

## **Anti-Bribery and Corruption Policy**

Bribery or corruption is not acceptable by or on behalf of any business activities which are carried out by Steve Garven Ltd.

I am committed to a zero-tolerance approach to bribery and corruption.

I commit to acting fairly, honestly, openly and in an ethical manner in all my business dealings and relationships wherever I practice.

I will not directly or, indirectly provide money or inducement of value to any person:

- with the intention of obtaining, retaining, or rewarding any improper commercial or other advantage.
- induce any person to act improperly or to reward them for doing so knowing or believing that acceptance by that person would in itself, be improper.
- receive money or anything else of value where you know or suspect that it is offered or
  provided either with the intention of inducing any person to provide any improper
  commercial or other advantage or to act improperly, or as a reward for doing so.

I am committed to upholding applicable national and international laws and regulations relevant to countering bribery and corruption wherever I practice.

Steve Garven

(March 2020)