

Anti-Bribery and Corruption Policy

Bribery – Zero Tolerance

Longulf does not believe that bribery and corruption has any place in the modern business and will not tolerate it in the Company or its associates.

Under English law, offering a payment or other benefit may constitute a bribe in two basic cases:

First: A promise or a gift of financial or other advantage is offered directly or indirectly to another person and there is an intent either to induce or reward improper performance by that person of his or her duties.

Secondly: A payment or other advantage is promised or given to another person, where it is believed by the person instigating it that it is improper for that person to accept the same.

Under the Bribery Act, 2010, it is also an offence to request or receive a bribe. These rules apply in each case, not just to public officials but employees in the private sector. In each case, the definition of what is improper performance is the test which applies in the UK, not in any foreign country in question.

Additionally, there is a specific offence related to bribing a foreign official. This offence arises if a payment or benefit is provided to a foreign public official (which includes NGOs like the UN or World Bank) who holds a legislative, administrative or judicial position outside the UK. The offence arises if the benefit is provided with a view to influencing the official and with the intent to obtain or retain business.

Facilitation Payment

The company does not authorise or condone the making or receiving of facilitation payments.

Political Contributions

Our policy as a company is not to make political contributions in any form.

Charitable Contributions

The company may make charitable contributions from time to time. The company will not make charitable contributions which may, or may appear to, be made primarily with a view to promoting the company's business interests.

Sponsorship

The company is open to consideration of commercial sponsorship as part of a balanced marketing approach and will consider each case on its merits. All sponsorship will be subject to the Board of Directors' approval.

Gifts, Hospitality, Entertainments

Our business partners should be aware that it is not permissible for Longulf employees to give or receive gifts, hospitality or favours that could influence any business decision or that create the appearance of influencing such decisions.

Partners are therefore not to provide gifts, hospitality or favours to any Longulf employee, their family members or friends other than the following:

- Promotional material and reasonable business entertainment such as business breakfasts, lunches or dinners;
- Personal hospitality to events such as sporting events or theatre, provided that the travel and accommodation costs are not included;
- Business conferences and/or seminars provided that travel and accommodation costs are not included.

Transactions with Associated Persons

The company may become exposed to criminal charges under the Bribery Act by the action of any person associated with it who bribes anyone to obtain or retain business for the company or any advantage for the company in the conduct of its business.

A risk assessment will be carried out on the associate as part of the due diligence. The risk assessment will identify the risks of bribes being given by the associated person to further the company's business. This will form part of a broader risk assessment. Upon completion of this and the broader due diligence review, the Board of Directors will determine whether to proceed.

Speak Up Policy

Longulf has made provisions for an independent company to operate a Speak Up or Whistle-blower hotline which will provide anonymity should you wish to report any incident. To submit a report [click here](#) or email report@seehearspeakup.co.uk