

ANTI-BRIBERY POLICY

1. INTRODUCTION

Hewitt Associates Ltd (“the Company”) is committed to instilling a strong anti-corruption culture and to upholding all laws relevant to countering bribery and corruption, including, but not limited to, the Bribery Act 2010.

2. PURPOSE AND SCOPE

This policy applies to all employees, agents, contractors, subcontractors, consultants, business partners and any other parties (including individuals, partnerships and bodies corporate) associated with the Company or any of its subsidiaries. The purpose of this policy is to set out the responsibilities in observing and upholding the Company’s position on bribery and corruption and to provide information and guidance to those working for the Company on how to recognise and deal with bribery and corruption issues.

3. BRIBERY

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. The Company expressly 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 employee, 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.

4. RESPONSIBILITY

- 4.1.** It is the responsibility of all employees, agents, contractors, subcontractors, consultants, business partners and any other parties associated with the Company or any of its subsidiaries:
- To ensure that this policy is read, understood and complied with

- To prevent, detect and report any acts or suspected acts of bribery or corruption
 - To avoid any activity that might lead to or suggest a breach of this policy
 - To exercise due diligence at all times when dealing with third parties on behalf of the Company
- 4.2.** Employees must notify the Managing Director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future and in the case of non-employees, their normal point of contact within the Company.
- 4.3.** Any breach of this policy will be dealt with by the Company's disciplinary procedure and could result in dismissal for gross misconduct.

5. RECORD KEEPING

The Company will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties (such as clients, suppliers and business contacts) will be prepared and maintained with strict accuracy and completeness. All parties are further expected to:

- Declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review
- Ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the Company's expenses policy and specifically record the reason for the expenditure

6. FACILITATION PAYMENTS

- 6.1.** Facilitation payments are small payments made to secure or speed up routine actions, usually by public officials, such as issuing permits, immigration controls, providing services or releasing goods held in customs. The Company will work to ensure that employees, agents, contractors, subcontractors, consultants, business partners and any other parties associated with the Company or any of its subsidiaries do not make facilitation payments on the Company's behalf.

- 6.2.** Facilitation payments constitute bribes and, subject to clause 6.3, may not be made at any time irrespective of prevailing business customs in certain territories.
- 6.3.** If the demand for a facilitation payment is accompanied by threat of physical harm then put safety first, make the payment and then report immediately to the Managing Director and in the case of non-employees, their normal point of contact within the Company, the circumstances and amount of the payment.

7. GIFTS, HOSPITALITY AND EXPENSES

- 7.1.** Genuine hospitality or similar business expenditure that is reasonable and proportionate is allowed provided that the hospitality or expense complies with the criteria outlined in clause 7.3 below.
- 7.2.** Gifts and hospitality can, when excessive, constitute a bribe and care and due diligence should be exercised at all times when giving or receiving any form of gift or hospitality on behalf of the Company.
- 7.3.** The following criteria should be used to test if gifts, hospitality or expenses comply with the Company's anti-bribery policy:
- Made for the right reason – if a gift or hospitality, it should be given clearly as an act of appreciation, if an expense then for a bona fide business purpose;
 - No obligation – the gift, hospitality or expense should not place the recipient under any obligation
 - No expectation – expectations are not created in the giver or an associate of the giver
 - Made openly – if made in secret and undocumented then the purpose will be open to question
 - Reasonable value – the size of the gift is small and the value of the hospitality or expense accords with general business practice. Cash should be neither given nor received as a gift under any circumstances
 - Appropriate – the nature of the gift, hospitality or expense is appropriate to the relationship and accords with general business practice
 - Legal – the gift or hospitality is compliant with relevant laws

- Reported - the gift, hospitality or expense should be recorded and reported to management
- Documented – the expense is fully documented including purpose and approvals given

8. POLICIES AND CHARITABLE DONATIONS

- 8.1.** The Company does not make contributions of any kind to political parties.
- 8.2.** No charitable donations will be made by the Company for the purpose of gaining any commercial advantage. Proof of receipt of all charitable donations must be obtained from the recipient organisation and under no circumstances may charitable donations be made in cash.

9. TRAINING

- 9.1.** Training on this policy will form part of the induction process when employees begin employment with the Company. Existing employees will receive regular and relevant training on this policy when required.
- 9.2.** All employees, agents, contractors, subcontractors, consultants, business partners and any other parties associated with the Company or any of its subsidiaries are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. The Company welcomes comments and suggestions with regard to improving the policy and its effectiveness.

10. MONITORING AND REVIEWING

The Company will monitor the effectiveness and review the implementation of this policy regularly to ensure its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

This policy has been approved & authorised by:

Name: David Hewitt

Position: Managing Director

Date: January 2023

Signature: 