

# Anti-Bribery Policy

## Our approach

We do business honestly. Bribery - in any form - is illegal, unethical, and completely unacceptable at Milbank. We have a zero-tolerance approach to it.

This policy applies to everyone who works for us or represents us - employees, directors, contractors, subcontractors, suppliers and agents. It applies wherever in the world we operate.

## What bribery is

Bribery means offering, promising, giving, requesting or accepting a financial or other advantage in order to influence someone to act improperly. In simple terms: paying someone to do something they should not do, or to get something you are not entitled to.

Under the Bribery Act 2010, there are four offences:

- Offering, promising or giving a bribe
- Requesting, agreeing to receive or accepting a bribe
- Bribing a foreign public official
- A company failing to prevent bribery by people associated with it

The penalties are severe: unlimited fines for businesses, and up to 10 years' imprisonment for individuals.

## What this means for you

You must not:

- Offer, promise or give a bribe to anyone - whether in the UK or abroad
- Request, agree to receive or accept a bribe from anyone
- Make a facilitation payment (a small payment to speed up routine government processes) - these are illegal under UK law, even if they are common in some countries
- Make a political donation on behalf of the Company
- Make a charitable donation where the purpose is to gain a business advantage

## Gifts and hospitality

Normal, reasonable business hospitality is fine. A modest lunch after a meeting, a small promotional gift, occasional attendance at a sporting or cultural event - these are a normal part of doing business and are not prohibited.

What is not acceptable:

- Gifts or hospitality that are intended to influence a business decision
- Cash gifts - never acceptable, in any amount
- Lavish or excessive hospitality that goes beyond what is reasonable
- Entertainment of a sexual nature
- Any arrangement where there is an expectation of something in return

If you are offered a gift or hospitality and you are unsure whether it is appropriate, speak to your manager before accepting. If in doubt, decline politely.

## Record keeping

All gifts and hospitality - given and received - must be recorded. This includes the value, the reason, and the business relationship. Your manager can explain how to record these in your business.

## New business and external relationships

When we develop new business relationships or enter into new contracts, we need to carry out appropriate due diligence. If you are developing a new business relationship, let your manager know so that the necessary checks can be carried out.

This is about protecting you and the business. Due diligence helps us make sure we are not inadvertently involved in bribery through our supply chain or business partners.

## Charitable donations

We actively support charitable giving - our 2% commitment to community projects is something we are proud of. But all charitable donations must be made transparently, without any expectation of business advantage in return, and with the approval of your manager.

## If you have concerns

If you see something that does not look right - an unusual payment, an excessive gift, pressure to make a facilitation payment, or anything that makes you uncomfortable - please speak up.

You can:

- Speak to your manager
- Contact the People Team at [peopleteam@milbank.co.uk](mailto:peopleteam@milbank.co.uk)
- Use our Whistleblowing Policy to raise a concern confidentially

You will be protected from retaliation for raising a genuine concern. We would always rather you spoke up and were wrong than stayed quiet and something went unchecked.

## Training

All colleagues will receive training on this policy so that you understand what bribery looks like and what to do if you encounter it. If you have not received training, or if you would like a refresher, speak to your manager.

## Consequences

Bribery is treated as gross misconduct. If you are found to have been involved in bribery, the likely outcome is summary dismissal. Depending on the circumstances, we may also be required to report the matter to the police.

## Questions

If you are unsure whether something you are doing, or being asked to do, could be considered bribery, contact [peopleteam@milbank.co.uk](mailto:peopleteam@milbank.co.uk).

It is always better to ask.

[milbankgroup.co.uk](https://milbankgroup.co.uk)

| Version | Date       | Author        | Changes   |
|---------|------------|---------------|-----------|
| V1      | -          | Milbank Group | Creation  |
| V2      | 30/04/2026 | Milbank Group | Approved. |