



ANTI-CORRUPTION AND BRIBERY POLICY

It is the policy of McKay Securities Plc (the 'Company') to conduct all business in an honest and ethical manner. The Company takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever the Company operates and implementing and enforcing effective systems to counter bribery.

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with the Company, or any of our subsidiaries or their employees, wherever located (collectively referred to as workers in this policy).

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. It is an offence under the Bribery Act 2010 to give or receive a bribe, or to bribe a foreign public official.

1.1 Gifts and Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. It is appreciated that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable and is not made with the intention of obtaining or retaining business or a business advantage. The intention behind the gift should always be considered. The Company operates a Hospitality Register held by the Company Secretary.

1.2 What is not acceptable

It is not acceptable to:

- 1.2.1 give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- 1.2.2 give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- 1.2.3 accept payment from a third party that it is known or suspected is offered with the expectation that it will obtain a business advantage for them;
- 1.2.4 accept a gift or hospitality from a third party if it is known or suspected that it is offered or provided with an expectation that a business advantage will be provided by the Company in return;
- 1.2.5 threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy;
- 1.2.6 accept for give gifts or hospitality valued at more than £500, without the prior approval of a Director of the Company; or
- 1.2.7 engage in any activity that might lead to a breach of this policy.



1.3 Facilitation Payments and Kickbacks

The Company does not make, and will not accept, facilitation payments or "kickbacks" of any kind. If asked to make a payment on the Company's behalf, it should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. A receipt should always be requested which details the reason for the payment. If there are any suspicions, concerns or queries regarding a payment, it should be raised with a Director.

All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

1.4 Donations

The Company does not make contributions to political parties. Charitable donations may not be made without the prior approval of a Company Director.

1.5 Raising Concerns

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all workers. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

If it is suspected that a breach of this policy has occurred or may occur in the future, please notify a Company Director or the Company Secretary using the procedure set out in the whistleblowing policy immediately.

1.6 Disciplinary Action

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. The Company reserves its right to terminate any contractual relationship with other workers if they breach this policy.

1.7 Policy Management

Publication – This policy shall be available through the Company Secretary and on the 'P' drive.

Effective Date – This policy is effective from June 2010 was last reviewed by the Board on 4 February 2021.

Revisions – The Company Secretary is responsible for the maintenance and accuracy of this policy. This policy will be reviewed annually.

Approved by the Board and signed by:

A handwritten signature in black ink, appearing to read 'S. Perkins', is written over a dotted line.

S. Perkins
Chief Executive Officer