

Anti-Bribery & Corruption Policy (AB&C)

[Hardy London Limited](#) is committed to high standards of ethical behaviour and has zero tolerance towards bribery and corruption.

[Hardy London Limited](#) requires its shareholders, employees, consultants and contractors to comply with all anti-bribery and corruption laws in all markets and jurisdiction in which it operates. These laws include the UK Bribery Act 2010, the UK Criminal Finances Act 2017 and the US Foreign Corrupt Practices Act, as well as other similar laws and regulations in the country [Hardy London Limited](#) operates.

The AB&C policy requires that books and records must be fair, accurate and kept in reasonable detail. [Hardy London Limited](#) requires all its shareholders, employees, consultants and contractors to comply with the following overarching principles in the performance of their services for and on behalf of [Hardy London Limited](#).

All activity must:

- Be conducted without intent to bribe or corrupt;
- Be reasonable and transparent;
- Not be considered lavish or disproportionate to the professional relationship;
- Be appropriately documented with business rationale; and
- Be authorised at an appropriate level of seniority.

Furthermore, it is unethical, illegal, and contrary to [Hardy London Limited](#)'s principles and good corporate governance to bribe or corrupt others, including to:

- Offer, promise, give or authorise others to give or agree with anyone else to offer, promise, give or authorise other to give, anything of value, directly or indirectly, to any party, or to influence any public official; or
- Solicit or receive anything of value, directly or indirectly, from any party; or
- Offer or provide a facilitation payment;

in order to obtain or retain business or otherwise gain an unfair advantage in business.

Last updated: May 2020