

1. PURPOSE

- 1.1. Concert is committed to conducting business in compliance with all applicable laws and regulations and in accordance with the highest ethical standards.
- 1.2. In recognition of the foregoing commitment, Concert has adopted a zero tolerance for bribery in both the public and private sectors. We would rather lose a particular piece of business than engage in illegal or unethical conduct.

2. SCOPE

- 2.1. This Anti-Bribery Policy applies to all Concert Partners, employees and contractors. All are personally responsible for understanding and complying with the law and particular policies prohibiting bribery to which Concert and Partners, employees and contractors are subject.
- 2.2. Severe penalties can be imposed on Concert as well as any Partner, employee or contractor involved in violating any of the anti-bribery laws to which they or Concert are subject.
- 2.3. In addition, violation of the applicable anti bribery laws or this Anti-Bribery Policy can lead to disciplinary action by Concert, up to and including termination of employment.

3. BRIBERY

- 3.1. Partners, employees and contractors must not directly or indirectly, offer, promise or give anything of value to anyone with the intention to:
 - 3.1.1. influence someone to obtain or retain business; or
 - 3.1.2. cause or reward improper performance of official, business, or professional obligations.
- 3.2. In addition, Partners, employees and contractors must not directly or indirectly, request, agree to, receive or accept anything of value as an incentive or reward for acting improperly, in violation of their duty of loyalty to Concert.

4. BUSINESS COURTESIES

- 4.1. While business courtesies, (which include gifts, meals, entertainment, transportation, lodging or per diems), that promote business relations can be legitimate, some business courtesies can constitute bribes in certain circumstances. Therefore, before offering or accepting any business courtesy, you must consider carefully whether the business courtesy is appropriate and follow the requirements below:
 - 4.1.1. The business courtesy must be offered, given or received for a legitimate business purpose;
 - 4.1.2. The business courtesy must not be too frequent when combined with all other business courtesies provided to a particular recipient or accepted by you over the course of twelve months;
 - 4.1.3. The business courtesy must be given or received openly (*i.e.*, not hidden from the superiors of the recipient or from others);
 - 4.1.4. The business courtesy must not be lavish or extravagant; and
 - 4.1.5. Cash or cash equivalent gifts are never permissible

5. DONATIONS

- 5.1. Concert recognises that making donations, (which include charitable and educational donations), is an important part of our business. At the same time, Concert must ensure that all of its donations are appropriate. Therefore, the following is required:
 - 5.1.1. Donations or contribution towards education must never be made in cash.
 - 5.1.2. Donations should be made only to organisations that can be relied upon to use the donation in the manner intended by Concert.
 - 5.1.3. Donations to public officials are prohibited.

5.1.4. Appropriate documentation evidencing the donation is required.

6. EXPENSES

- 6.1. Expenses and expense forms should be submitted to the Finance team in the normal way; however, they must clearly detail the client's name and company name for any business entertaining.
- 6.2. The receipt must be the original receipt detailing what has been purchased and all expenses require Partner approval.

7. REPORTING VIOLATIONS AND DISCIPLINARY ACTION

- 7.1. Failing to comply with the laws prohibiting public and private sector bribery, this Anti-Bribery Policy and related policies and procedures may result in disciplinary action that can include termination of employment.
- 7.2. All reports of possible non-compliance will be taken seriously, and appropriate remedial action will be taken as needed.
- 7.3. Any employee or contractor who learns of possible bribery involving Concert must report his or her concerns immediately, preferably in writing, to his or her manager/Partner. Failure to make a timely report may itself be grounds for disciplinary action, up to and including termination of employment.
- 7.4. No retaliation or repercussions will be permitted against any individual who reports in good faith a possible bribery problem involving Concert.
- 7.5. If at any time you have any doubts or concerns that events, hospitality, business courtesy is not appropriate and needs to be checked, employees should address this matter with their line manager/ Partner to determine whether it is appropriate.