

Estate Insurance Group

Anti-bribery Code of Conduct

Estate Insurance Group believes that integrity and fair dealing are essential assets of the company and this should be reflected in all activities. Each employee has a responsibility to ensure that the company will not get involved in corruption.

The sanctions for neglecting this duty are described in reference to the sanctions taken by the company in case of non-compliance of the anti-bribery code. Both active and passive bribery is illegal according to the UK Bribery Act 2010

No employee nor any other person representing Estate Insurance Group such as agents, suppliers, joint venture partners or others, may on any occasion, neither directly or indirectly, offer anything of value to any person that directly or indirectly represents a client or a supplier in order to gain an advantage or as a reward for a favour.

[The terms “things of value” and “ advantage” might be specified for instance as present, gift, loan, fee, commission, compensation, acknowledgement, job, position, contract, service, favour etc.]

Agents, suppliers and third parties

The company can be held responsible for unlawful actions committed by external partners if it can be proven that the company by negligence has overseen the red flags of warning that indicate that an agent might be using bribery. It is very important that employees are following these rules when working with external partners:

- Only use well qualified companies and representatives with a good reputation
- Please contact [Jeremy Stephen - Director] and ask for advice if you identify one or more of these “red flags of alert” – e.g. if the agent:
 - Has a questionable reputation.
 - Suggests a deal that indicates bribery.
 - Neglects the company code of conduct.
 - Does not appear to be a fair dealer in other situations.
 - Does not show any interest in quality, training, guarantees etc.
 - Has a relationship (such as family ties or former employment) that could improperly influence the client’s decision.
 - Requests an unusual payment method such as transferring the commission to a bank in a third country or to another currency than normally used in for transactions in the country of the agent.
 - Breaks up the contract sum into smaller amounts.
 - Claims that he or she can help secure the contract because he or she has a "special agreement" with the customer of the contract.
 - Requires payment in advance.

- Requires a commission that is unusually large in relation to the service provided. It is also a clear indication of questionable activity if the agent requires that a bid should be made through a specific sales agent or partner.

Gifts and entertainment expenses

As a rule, gifts or services offered by an employee or agent representing Estate Insurance Group should never exceed a value that the recipient could be expected to reciprocate. Always remember that:

- Gifts should never be offered secretly.
- Money should never be offered as a gift.
- When offering a gift, the economic situation of the receiver should always be considered, and a gift should never exceed the recipient's ability to repay.
- Never offer gifts when you are bidding for a contract or at any stage of a procurement tender.
- Entertainment such as dinner invitations should never be extravagant.
- Voyages and business trips should always have a legitimate business purpose and should never be offered secretly.

When accepting gifts the general rules are:

- It is not allowed to accept gifts given with the purpose of influencing upon a decision. This also applies to all kinds of special services and the procurements of goods at a price far below market value.
- It is not allowed to accept gifts of a value exceeding £200 for staff and £1000 Directors.
- In case it would be considered impolite *not* to accept a rather extravagant dinner invitation, it should only be accepted under the condition that the company reciprocates the invitation on a later occasion.

Political campaign contributions

Political campaign contributions are normally made to the political candidates and parties that represent the political viewpoints of Estate Insurance Group.

The risk factor of these political contributions is that they can be seen as *quid-pro-quo*, made to obtain and ensure favourable conditions under the government of this special political party (favouritism) or in some cases as bribery for a special consideration.

- Political contributions given in money or otherwise should only be made by Nick Sellick – Managing Director.
- Always make sure that the political campaign contributions are made within the general limits, laid down by law.
- No other person, representing the company is allowed, directly or indirectly, to offer anything of value to a political party or a person representing a political party or to a candidate for a government (or other public) post.

Petty corruption

Petty corruption or “slipping a few quid” refers to the situation, in which a small amount of money is paid to get goods through customs, to get import licence papers stamped rapidly and so on. It is services that should be free of charge, according to the law.

- Corruption is illegal and should be avoided. If you pay, you facilitate and maintain the use of bribery. Instead you should refer to legal practise and to your company code of conduct.
- If all other possibilities are exhausted: Keep payment at a minimum level, in many countries \$ 1 is a fair amount of money.
- Account to the company for the expenses.
- Inform a senior manager about the incident and explain why you had to pay.

Conflicting interests

If an employee has got into a situation with conflicting interests between personal and company interests, it is your duty to contact Jeremy Stephen. This applies if you:

- Have a financial stake in the activities of a supplier or others that are doing business with the company.
- Are in a vulnerable situation personally and therefore at risk for giving favourable conditions to certain suppliers, clients, customers, candidates or subordinates.

All expenses should be recorded

As an employee or an external partner I will always record all financial transactions properly in appropriate books of account.

Reporting

If you learn that other employees or external partners are violating this anti-bribery code of conduct, you should, for the sake of your colleagues and Estate Insurance Group, immediately report this to Jeremy Stephen – Director.

Get to know the anti-bribery code and ask if in doubt

As an employee of Estate Insurance Group I am aware of my responsibility of getting acquainted with this company code of conduct. Should there be any doubtful behaviour or ways of acting that has not been taken into account by these codes, I will not conclude from this that it is allowed.

Authorised By Jeremy Stephen
Managing Director
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