



## Anti-Bribery and Corruption (ABC) Policy

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## Document Control

This is a CONTROLLED document and updates or changes to this document are authorised and then made available on Bamboo.

It is UNCONTROLLED when printed. You should verify that you have the most current version. It is suggested that you check Bamboo for the latest version.

#	Review Date:	Review Completed by:	Reason for change:
1	October 2025	Group Risk, MLRO and ESG Manager	Policy creation
	November 2025	Head of LRC	Review
	November 2025	Executive Risk Committee	Policy approval

## Overview

The Law Debenture Corporation p.l.c. and all of its subsidiary companies (the "Group") are committed to conducting their business fairly, honestly and with transparency and in compliance with all legal and regulatory obligations.

This policy sets out the organisation's commitment to preventing bribery and corruption, in line with the FCA Handbook, Financial Crime Guide, and the Bribery Act 2010. It outlines key principles including top-level commitment, risk assessment, proportionate procedures, and due diligence. All employees and associated persons must act with integrity, and any breaches may result in disciplinary or criminal action.

## Purpose

This policy outlines the organisation's commitment to preventing bribery and corruption in all its forms, in compliance with:

- SYSC 6.1.1R of the FCA Handbook
- FCA Financial Crime Guide (FCG)
- Section 7 of the Bribery Act 2010.

## Policy Statement

The Group operates a zero-tolerance approach to bribery and corruption. All employees, contractors, and associated persons must act with integrity and transparency in all business dealings.

## Legal and Regulatory Framework

- **SYSC 6.1.1R** requires firms to establish and maintain adequate policies and procedures to ensure compliance and prevent financial crime, including bribery.
- **The FCA Financial Crime Guide** expects firms to have effective systems and controls to mitigate bribery and corruption risks.
- **Section 7 of the Bribery Act 2010** makes it a criminal offence for a commercial organisation to fail to prevent bribery by associated persons. A defence exists if the organisation can demonstrate it had adequate procedures in place.

## Key Principles

The below six principles, outlined in the UK Bribery Act 2010 guidance, are applied to form the Group's risk-based approach to building an effective anti-bribery and corruption ("**ABC**") framework.

Principles	Activity
<b>Top-Level Commitment</b>	Senior management lead by example and actively commit to ABC efforts.
<b>Risk Assessment</b>	Regular assessments of bribery and corruption risks are carried out, which identify the potential for bribery within the Group, and with appropriate controls in place to mitigate risks.
<b>Proportionate Procedures</b>	Controls must be appropriate to the size, complexity, and risk profile of the business. These include carrying out due diligence, explicit prohibition of certain conduct (outlined below) and our <b>Gifts, Entertainment and Hospitality Policy</b> .
<b>Due Diligence</b>	Thorough checks on third parties, agents, and contractors. Compliance with all relevant laws and regulations including the

	Bribery Act 2010 is written into contractual agreements.
<b>Communication and Training</b>	Staff receive regular ABC training and our ABC policy is shared to all staff, including at induction, to ensure everyone understands their responsibilities.
<b>Monitoring and Review</b>	Ongoing oversight and periodic reviews of systems and controls, to ensure ABC measures are continually effective.

## Prohibited Conduct

- Offering, promising, giving, requesting, or accepting bribes.
- Bribery of foreign public officials.
- Facilitation payments.
- Political donations
- Any conduct intended to improperly influence business decisions.

If you are in any doubt of whether an activity is permitted, seek guidance from your manager, Business Head or a member of the Risk Team.

## Gifts, Entertainment and Hospitality - overview

Modest hospitality and small gifts can help build business relationships if offered appropriately. However, care must be taken to avoid any perception of bribery or undue influence.

To comply with the Bribery Act 2010, we have clear procedures to ensure no employee or third party offers or accepts anything that could be seen as a bribe. Please refer to our **Gifts, Entertainment and Hospitality policy**.

## Reporting and Whistleblowing

All suspected bribery or corruption must be reported immediately. Any suspected bribery or corruption must be reported under the **Incident Management Policy** or via the **Whistleblowing Policy**.

Whistleblowers are protected under internal policies and applicable laws.

## Consequences of Breach

- Disciplinary action, including dismissal.
- Criminal prosecution under the Bribery Act.
- Regulatory enforcement by the FCA.

## Review Cycle

This policy will be reviewed regularly or following any significant legal or regulatory changes.