



## **Information on bribery and corruption policy within the Close Brothers Group**

### Anti-bribery and corruption within Winterflood

The as a subsidiary of Close Brothers Group plc, Winterflood Securities Limited (“Wins”) is committed to carrying out business fairly, honestly and openly. Wins operates a zero tolerance approach to bribery and corruption and is dedicated to ensuring full compliance with all applicable anti-bribery and corruption laws and regulations, including the UK Bribery Act 2010. Employees, officers and directors of Wins are prohibited from the making of any payment, inducement or reward on behalf of Wins that could be construed or interpreted as a bribe and from offering or accepting any gift or hospitality on behalf of Wins that creates or appears to create a conflict of interest for those involved.

Comprehensive anti-bribery policies and procedures have been implemented within Wins with application to all Wins staff, regardless of geographic location. Violation of internal anti-bribery policies by Wins employees is taken extremely seriously and may result in disciplinary action for those involved which, in serious cases, could lead to termination of employment.

Wins encourages its employees to report any activity that may constitute a violation of laws, regulations or internal policy. Reporting channels are provided to staff for this purpose within the framework of a whistleblowing policy. Failure by an employee to report known or suspected violations may lead to disciplinary action.

As part of the anti-bribery culture encouraged within Wins, all staff receive anti-bribery and corruption training. Employees in higher-risk business areas are given enhanced training.

### Payments to foreign public officials

Internal approval is required prior to the making of any payment or the giving of any gift or hospitality to a foreign public official (either directly or indirectly).

### Gifts & hospitality

Wins allows the receipt or offer of gifts, entertainment and hospitality in connection with matters properly related to our business. These activities are acceptable provided they fall within reasonable bounds of value and occurrence and where they are a normal and appropriate expression of business courtesy. Wins employees are required to ensure that the offer or acceptance of a gift or instance of hospitality does not create or appear to create a conflict of interest for those involved. Under no circumstances can gifts of cash (of any amount), or cash equivalents, be accepted.

### Procurement

Wins employs procurement processes which are designed to remove the opportunity for corruption and bribery. Measures taken include documented sourcing processes and appropriate segregation of duties.

### Political donations

Wins does not allow political contributions or donations to be made on its behalf without specific approval of the Wins Board of Directors.