

# FIRST / NAMES GROUP

## PUBLIC STATEMENT

### **FIRST NAMES GROUP: Anti Bribery and Corruption Policy**

First Names Group is committed to maintaining the highest levels of legal and ethical standards in the conduct of its business and to operating in an honest and transparent way, without bribery or corruption being used to obtain any unfair advantage.

We have established an internal policy, "The Anti-Bribery and Corruption Policy", supported by training and adequate procedures and controls which apply strictly to all employees, directors, agents, consultants, contractors and to any other person or bodies acting on behalf of the Group within all countries, areas and functions in which we operate.

This, our Public Statement, is made in order to communicate to potential business partners, clients, or future employees what they can expect with regard to the First Names Group approach to Bribery and Corruption in any external engagement or relationship. These standards are applied to our fiduciary clients via their corporate or trust structures.

### **Our Zero Tolerance stance**

The Group will not condone any employee, contractor, client or any party with which we do business or who might conduct business on our behalf:

- / offering, promising or making, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
- / requesting, agreeing to receive, or accepting a payment, gift or hospitality in the expectation or belief that a business advantage will be awarded, or as a reward for a business advantage already granted
- / taking any action aimed at securing a commercial, contractual or regulatory advantage for First Names Group or its clients that is unethical or results in personal pecuniary advantage for a First Names Group employee, related individual, client or related client entity or person.
- / bribing an individual in public office or service anywhere in the world in the course of conducting business for or with First Names Group
- / making a facilitation payment to any individual in the course of conducting business for or with First Names Group
- / making a charitable contribution knowing that there is a political interest in that charity, or where such a contribution would not be considered legal and ethical under local laws and practices.
- / making contributions to political parties or representatives of political parties.

Here at First Names Group we take our role in the prevention of Bribery and Corruption, with its negative social, regulatory and legal associations very seriously. To that end, First Names Group will not knowingly conduct business or continue in a business relationship where an employee, service provider, agent or contractor acts outside of our anti-bribery and corruption principles.