



Bribery Policy

Statement of Company Policy

Norton & Associates requires its staff at all times to act honestly and with integrity and to safeguard the resources for which they are responsible.

Norton & Associates is committed to ensuring that its business is conducted in an open and transparent manner and it will take all appropriate steps to address the risks of bribery.

Norton & Associates condemns all acts of bribery or corruption; any cases brought to its attention will be investigated and dealt with appropriately.

Norton & Associates is committed to international standards of integrity and to ensuring it adheres to and promotes best practice in bribery prevention.

Definition & Scope

Bribery is commonly described as the offer or acceptance of a reward to persuade another to act dishonestly and or in breach of the law.

It includes the offering, promising, giving, receiving or soliciting of a financial, academic or other advantage or favour as a means to influence the actions of an individual (or individuals).

The Bribery Act 2010 provides for 4 bribery offences:

- **Bribing: offering, promising or giving an advantage;**
- **Being bribed: requesting, agreeing to or accepting an advantage;**
- **Bribing a foreign official;**
- **Failing as an organisation to prevent any person who performs services on its behalf from committing an act of bribery.**

Norton & Associates will work to adopt and adhere to the six principles of bribery prevention outlined in the Government's guidance document.

Responsibilities

Norton & Associates is responsible for the prevention, detection, reporting and handling of bribery and for making all relevant persons aware of the necessity of complying with this policy.

The Managing Director has a general responsibility for monitoring the operation and effectiveness of anti-bribery arrangements and should receive appropriate reports on any bribery activity.

Each member of staff or other person who performs a service or otherwise represents Norton & Associates is responsible for:



- acting with propriety at all times and in particular in the use of Company resources
- being alert to the possibility that unusual events, behaviours or transactions could be an indication of bribery;
- reporting details immediately through the appropriate channel if they suspect bribery is taking or has taken place;
- cooperating fully with whomever is conducting internal audits, reviews or investigations.

Applicability

This Policy extends to all of Norton & Associates' activities and operations and to all of its dealings and negotiations with third parties in all countries in which its staff, agents, partners and associates operate.

All employees and all individuals working on behalf of, under contract from or in collaboration with any part of Norton & Associates or with any of its employees are required to comply with this Policy.

Action in the Event of Bribery

All cases of actual or suspected bribery will be vigorously and promptly investigated and appropriate action will be taken. The police will be informed where considered appropriate.

In addition, disciplinary action will be considered, not only against those members of staff found to have perpetrated bribery, but also against Managers/Supervisors whose negligence is held to have facilitated or condoned an act of bribery. Both categories can be held to constitute gross misconduct, the penalty for which may include summary dismissal.

Jonathan Norton
Managing Director

This policy will be reviewed annually.

Signed  Date: 26/01/26