

Anti Bribery and Corruption Policy

Purpose of policy

The purpose of this policy is to establish controls, to ensure compliance with anti bribery and corruption regulations, and to ensure Top2% conducts business in an ethical, honest and responsible manner.

Policy Statement

The Bribery Act 2010 came into force in the UK on 1st July 2011. Offences under the Act can be summarised as:

- 1) Giving a bribe
- 2) Receiving a bribe
- 3) Bribing a foreign public official; and
- 4) Failing to prevent bribery

Bribery is the offering, providing or receiving something of value – including cash, gifts, hospitality or entertainment – as an inducement or reward for something improper. Usually, but not always, it is to obtain or retain business or some other illegitimate advantage.

It is our policy to conduct business in an honest and ethical manner. Bribery and corruption will not be tolerated. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.

Employees, associates or other personnel working in partnership with Top2% must not engage in any form of bribery, either directly or through any third party (such as an agent, buyer, supplier). Specifically no bribes must be paid to a foreign public official anywhere in the world. No activity must take place that may be misunderstood or perceived to be the offering of a bribe or other inducement.

We will uphold all laws relevant to countering bribery and corruption in all jurisdictions in which we operate. However we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If we are found to have taken part in bribery, we could face an unlimited fine, be excluded from tendering for public contracts and face significant damage to our reputation. We therefore take our legal and moral responsibilities very seriously.

Proportionality

This policy and the procedures applied by Top2% are considered proportionate given the nature, scale and complexity of the company's activities and areas of operation. The policy and

procedures are designed to prevent bribery by persons working for or associated with the company.

Top Level Commitment

Top2% is committed to operating with utmost honesty, integrity and professionalism. This commitment comes and is driven from the top. The company will enforce a zero tolerance policy to bribery and corruption.

It is the Director's intention to foster a culture within the organisation in which bribery is never acceptable. All reports of suspicious activity or allegations of dishonesty and bribery will be effectively investigated.

Gifts and hospitality

Only reasonable gifts or hospitality will be offered or received by Top2% officers, employees, associates and other personnel working in partnership with Top2%. They will never be offered or accepted if it may improperly influence a business decision, impair independence or judgement, or which could be regarded as illegal or improper, or which violates the recipient's policies.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test we will apply is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift will always be considered.

Therefore the giving or receiving of gifts or hospitality will only be permitted where they are transparent, proportionate, reasonable and bona fide.

We will also:

- Ensure all gifts and hospitality given and received in excess of £25.00 are recorded on a register.
- Check before offering customers any kind of gift or invitation that it doesn't breach their own rules and regulations.

Risk Assessment

As part of its regular risk management processes, Top2% assesses the nature and extent of its exposure to risks of bribery, and the measures taken to mitigate those risks.

Top2% does not use third parties in commercial negotiations and does not make any facilitation payments. All commercial negotiations are conducted by the Director.

Due diligence enquiries will be undertaken where appropriate (see below).

Due Diligence

In order to prevent bribery within our business relationships we will conduct due diligence checks, where necessary. This means we will research, assess and monitor any organisation or business that we enter a commercial relationship with to ensure that the behaviour of the organisation or business, and its personnel is consistent with Top2%'s values and anti bribery procedures.

Communication

The anti bribery and corruption policy will be shared with all staff and associates, who will receive a personal copy. The policy will also be made available via the company's web site.

Training

We will ensure that all Top2% personnel, associates and personnel with whom we work in partnership receive training on the anti-bribery and corruption provisions and regulations.

A personal copy of this policy will also be given to each person, and it will be made available on the company website.

Monitoring and Review

The Director will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability.

If the profile of the company's business activity or operating environment changes significantly the policy will be fully reviewed.

All employees, associates and other personnel working in partnership with Top2% are invited to comment on this policy and suggest ways in which it may be improved.

Application of the policy

This policy, its principles and procedures should be applied by the Director, associates, contractors and other personnel who work in partnership with Top2%.

If an instance of bribery is suspected or detected amongst or about personnel or associates they can refer to the Company Director. Such reports will be treated confidentially.