



# Anti-Bribery, Anti-Corruption & Anti-Money Laundering Policies

## Introduction

Bringelly takes the matters of bribery, corruption and money laundering seriously. We strive to set and uphold the professional standards expected of us; We are a Registered Firm by the Royal Institution of Chartered Surveyors (RICS), and our Directors are members of the Association for Project Management (APM) or RICS, who require organisations and individuals to uphold legal and professional standards as a condition of membership.

As part of the requirements for a Regulated Firm, we have used RICS advice to set up our anti-bribery and anti-corruption policies.

We are a small business and we work in the UK, we generally do not supply our services to high-risk customers or those operating outside the UK. Therefore, our policies and procedures are proportional to the nature of the risk we would face when providing our services.

## Context of our Services

Bringelly works in the UK jurisdiction and, as such, is governed by the Bribery Act 2010.

As noted above, we do not operate in high-risk jurisdictions, so our due diligence and risk-awareness is focused on UK businesses and individuals.

One of our Directors, Emma Gittus, is our designated compliance officer for these matters and completes regular awareness training on anti-bribery and anti-corruption issues.

As part of the adherence to the law, which includes offences of failure to prevent bribery, we will undertake the following prior to and during providing our professional services to our customers:

- Assess the risk of bribery, corruption or money-laundering in a potential customer with respect to the provision of any of our services
- Request information on the customer's organisation, such as registered office, source of funds, as appropriate, ability to pay and ensure that the customer requesting the service is also the authorised purchaser of the services
- Where more than one customer is instructing the service, these customers will be identified in our Terms and Conditions/provision of service contract, and due diligence will be undertaken on these people/organisations, prior to accepting the commission
- If we have any suspicions that our potential or actual customers are undertaking activities which could be construed as bribery, corruption, money laundering and/or terrorist financing, we will report these to the relevant authorities.

## Definitions of Bribery and Corruption

(taken from the RICS' professional statement on Countering bribery and corruption. Money laundering and terrorist financing, 1st edition, Feb 2019, [www.rics.org.uk](http://www.rics.org.uk))

**Bribery:** The offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action that is illegal, unethical or a breach of trust.

**Corruption:** The misuse of public office or power for private gain, or misuse of private power in relation to business practice and performance.

**Money laundering:** Concealing the source of the proceeds of criminal activity to disguise their illegal origin. This may take place through hiding, transferring and/or recycling illicit money or other currency through one or more transactions, or converting criminal proceeds into seemingly legitimate property.

## Anti-Bribery & Anti-Corruption Policy

We will

- not offer or accept, directly or indirectly, anything that could constitute a bribe
- have plans in place to comply with applicable laws governing bribery and corruption, and ensure that these are followed
- report any activity they are aware of that breaches anti-bribery and corruption laws to the relevant authorities (as specified in local legislation); where there is no local legislation the activity should be recorded and, if possible, reported to a senior manager
- act with due diligence to perform periodic written evaluations of the risks that face the firm and that may lead to the facilitation of bribery or corruption; in determining the appropriate level of due diligence, the firm may consider the type of business activities they engage in and the environment in which they operate
- retain information detailing how the firm has met the requirements of this professional statement.
- not offer or accept, directly or indirectly, anything that could constitute a bribe
- ensure that they have adequate knowledge of bribery and corruption to be able to comply with the requirements of this professional statement
- report any activity they are aware of that breaches applicable anti-bribery and corruption laws to the relevant authorities (as specified in local legislation); where there is no local legislation the activity should be recorded and, if possible, reported to a senior manager



## Anti-Money & Terrorist Financing Laundering Policy

Bringelly Ltd is at lower risk from money laundering and terrorist financing so our policies on this matter reflect our professional standards and the size and nature of our business. The list of measures we will undertake to minimise our exposure to risks posed by money laundering and/or terrorist financing reflect the good practice and legal framework we operate in and are listed below.

We will:

- not facilitate or be complicit in money laundering or terrorist financing activities
- have systems and training in place to comply with these laws, and ensure these are followed
- report any suspicions of money laundering or terrorist financing activities to the relevant authorities (as specified in local legislation)
- evaluate and review periodically the risks that prospective and existing business relationships present in terms of money laundering or terrorist financing offences taking place
- ensure that their responses to the risks identified are appropriate, including conducting appropriate checks on clients and customers
- use reliance only where there is an appropriate level of confidence in the quality of the information provided by the third party – reliance should only be taken from third parties with standards conforming to the legal requirements, that provide the obliged market participant with a complete exchange of all legally required AML information regarding the identified party and only by confirming the identity and verification of identity of the client or counterparty in question; ultimate responsibility for the assessment of risk and actions taken based on this remain with the member or regulated firm
- take appropriate measures to understand the client and the purpose of the transaction
- verify the identity of their client by undertaking basic identity checks
- record and retain information detailing how the firm has met the requirements of this professional statement.
- not facilitate or be complicit in money laundering or terrorist financing activities
- report any suspicions of money laundering or terrorist financing activities to the relevant authorities (as specified in local legislation); where there is no local legislation the activity should be recorded and, if possible, reported to a senior manager

This policy was produced in September 2023 and will be reviewed on an annual basis and updated as required.