

Veritas Investment Management LLP

Anti-Bribery and Corruption Policy

Summary

Introduction

Veritas Investment Management LLP (VIM) is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. VIM has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

What is Bribery and Corruption?

Bribery and Corruption is the;

- Offering, promising or giving a bribe, which includes facilitation payments and “kickbacks” (active bribery)
- Requesting, agreeing to receive or accepting a bribe (passive bribery)
- Acting as an intermediary (i.e. facilitating an act of bribery); and
- Bribing public officials

VIM has established the following policies on the provision or receipt of financial and non-monetary benefits.

Training

All employees receive Financial Crime training

Gifts and hospitality

Gifts and hospitality may be offered or accepted only in accordance with the Gifts and Hospitality policy and recorded on the appropriate registers. Pre-approval must be obtained for all Gifts/Hospitality over £250.

Facilitation payments

VIM does not accept and will not make any form of facilitation payment and does not allow kickbacks to be made or accepted.

Political Contributions

VIM will not contribute to an overtly political charity, organisation or campaign.

Charitable Contributions

Charitable donations may be offered only in accordance with the Charitable Giving Policy and recorded on the appropriate registers. VIM commits to contribute a fixed annual amount to a range of charities. Corporate donations need to be approved by two partners.