

## Landward Research Anti-Fraud and Corruption Policy

Landward Research is committed to conducting business in accordance with the highest ethical and legal standards. The public, participants in our projects, and our customers have the right to expect that professional, competent and trustworthy people are employed by Landward Research wherever we operate.

We will comply with applicable legislation. In line with the Fraud Act 2006 and the Bribery Act 2010, Landward Research has a 'zero tolerance' policy towards fraud, bribery and corruption and will thoroughly investigate and seek to take disciplinary and/or legal action against those who perpetrate, are involved in, or assist with fraudulent or other improper activities in all our operations.

- **Fraud** is taking, attempting to take, or obtaining by deception, money or any other benefit when not entitled to that benefit.
- **Bribery** is offering, promising, giving or receiving a financial or other inducement with the intention of encouraging or ensuring a particular outcome. Inducements can take the form of gifts, loans, fees, rewards or other advantages.
- **Corruption** is offering, giving, soliciting or acceptance of an inducement or reward that may influence the actions taken by Landward Research directors, employees, agency staff, contractors and subcontractors.

Landward Research is committed to

- Ensuring efficient and effective systems, procedures and internal controls are in place to enable the prevention and detection of fraud, bribery and corruption
- Ensuring managers identify fraud, bribery and corruption risks in their areas of business and that all systems, procedures and internal controls are properly implemented and enforced
- Ensuring all members of staff understand that they have a formal duty to report any internal and external suspicions or incidents of fraud, bribery and corruption
- Continuously reviewing its systems, procedures and internal controls through risk management processes and audit arrangements.

We will provide adequate and appropriate resources to implement this policy and will ensure it is communicated and understood. The Landward Research CEO will review this policy statement annually to reflect new legal and regulatory developments and ensure good practice.