

ANTI-BRIBERY AND CORRUPTION CONTROLS WITHIN CATER ALLEN PRIVATE BANK



Cater Allen Private Bank Anti-bribery and corruption standards

Cater Allen Private Bank ('CAPB') is committed to carrying out business fairly, honestly and openly. CAPB operates a zero tolerance approach to bribery and corruption and is dedicated to ensuring full compliance with all applicable anti-corruption laws and regulations including the UK Bribery Act 2010.

Associated Persons

Persons associated with CAPB, including but not limited to, third party introducing brokers, agents, consultants and intermediaries ('Associated Persons') are prohibited from providing any payment, inducement or reward on CAPB's behalf that could be construed or interpreted as a bribe.

Third parties involved in the referral of business to CAPB are required to comply with all applicable anti-bribery and corruption legislation in accordance with the CAPB Intermediary Terms of Business. CAPB expects the highest standards of conduct from the third parties with which it transacts and reserves the right to terminate a referral arrangement in the event that these standards are not met.

Gifts and hospitality connected to CAPB

CAPB permits the offer or receipt of gifts and hospitality in connection with matters properly related to its business. CAPB regards such activities as acceptable provided they fall within reasonable bounds of value and frequency and are an appropriate expression of business courtesy. Associated Persons performing services on behalf of CAPB must ensure that the offer or acceptance of gifts and/or hospitality directly or indirectly connected to CAPB's business affairs does not create any conflict of interest or confer any obligation for those involved.

Facilitation payments

Facilitation payments are typically small, unofficial payments made to secure or expedite routine action by a government official. CAPB does not allow the making of facilitation payments on its behalf or in connection with its business affairs.

Political donations connected to CAPB

CAPB does not allow political donations to be made on its behalf by Associated Persons connected to it.

Further information

Should you require any further information regarding CAPB's anti-bribery and corruption programme, please contact the CAPB Executive Team on 0800 092 5500.



Cater Allen Private Bank is able to provide literature in alternative formats. The formats available are: Large Print, Braille and Audio CD. If you would like to register to receive correspondence in an alternative format please contact us on 0800 092 3300 or 0330 123 0719 from a mobile. For the hard of hearing and/or speech impaired please use the Text Relay service. Further details can be found at <http://ngts.org.uk/>.

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