

ANTI-BRIBERY AND CORRUPTION CONTROLS WITHIN CATER ALLEN PRIVATE BANK



FACT SHEET

Anti-bribery and corruption standards

Cater Allen is committed to carrying out business fairly, honestly and openly. We operate a zero tolerance approach to bribery and corruption and are dedicated to ensuring full compliance with all applicable anti-corruption laws and regulations including the UK Bribery Act 2010.

Associated Persons

Persons associated with Cater Allen, 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 our behalf that could be construed or interpreted as a bribe.

Third parties involved in the referral of business to us are required to comply with all applicable anti-bribery and corruption legislation in accordance with our Intermediary Terms of Business. We expect the highest standards of conduct from the third parties with which we transact and we reserve the right to terminate a referral arrangement in the event that these standards aren't met.

Gifts and hospitality

We permit the offer or receipt of gifts and hospitality in connection with matters related to business undertaken with us, provided such activities fall within reasonable bounds of value and frequency and are an appropriate expression of business courtesy. Associated Persons must ensure that the offer or acceptance of gifts and/or hospitality directly or indirectly connected to our business doesn't 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. We don't allow the making of facilitation payments on our behalf or in connection with any business undertaken with us.

Political donations

We don't allow political donations to be made on our behalf by Associated Persons connected to us.

Further information

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



Cater Allen Private Bank can provide literature in alternative formats. The formats are: large print, braille and audio CD. If you'd like to register to receive correspondence in an alternative format contact us on 0800 092 3300. If you are deaf, have hearing loss or speech loss, please use Relay UK at relayuk.bt.com. This is a free service that can help you communicate over the phone.

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