



## **Silverlight Research Anti-Bribery and Corruption Policy**

*Last Updated November 2017*

### **Introduction**

It is Silverlight Research's policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and implementing and enforcing effective systems to counter bribery. Silverlight Research expects the same approach from all those with whom we do business.

This policy sets out Silverlight Research's position on bribery and corruption.

### **Bribery**

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Bribery includes:

- Payments to a company's employees or their relatives, or to those of a third party, to secure a business advantage
- Gifts, hospitality and expenses payments made to secure a business advantage
- Political contributions made to secure a business advantage
- Facilitation payments or "kickbacks" made to secure or accelerate routine or necessary business actions

### **Scope**

This policy applies to all Silverlight Research's employees and associated persons acting on behalf of Silverlight Research, and extends to our business dealings in all jurisdictions within which we operate.

### **Silverlight Research Policy**

Silverlight Research does not engage in bribery or corruption. It is contrary to Silverlight Research's policy for any employee or third party acting on behalf of Silverlight Research to request, offer, solicit, make or receive any payments or inducements which are illegal, unethical or represent a breach of trust.

Silverlight Research respects all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate, particularly laws that are directly relevant to specific or local business practices.

Silverlight Research will not do business with any person or company which we know (or have reasonable grounds for suspecting) engages in bribery or corruption.

### **Responsibilities**

Each Silverlight Research employee receives training in respect of this policy and it is the responsibility of each Silverlight Research employee to ensure compliance with the terms of this policy. If any employee believes that the terms of this policy are not being correctly adhered to then they should seek to raise their concerns with management.

### **Compliance**

Compliance with this policy will be subject to regular review, to ensure it remains suitable, effective and proportionate having regard to Silverlight Research's operations and the jurisdictions within which we operate. Any concerns raised by any person relating to any alleged non-compliance with the terms of this policy will be immediately investigated and, if appropriate, action will be taken. Failure to observe the terms of this policy may constitute a disciplinary offence and may expose individuals to civil or criminal proceedings.