

Dealer Net Finance – Anti-Bribery Policy

Introduction

The Financial Conduct Authority places a responsibility on all regulated firms to make sure that the firm cannot be used to further financial crime including bribery that is also subject to the Bribery Act 2010.

Howard Musgrave of Dealer Net Finance Ltd is committed to doing business ethically, with the highest standards of integrity, and expects its employees, self-employed 'advisers' or 'consultants' and business partners to work to these standards.

This policy sets out your responsibilities as an employee ('employee' includes all personnel regardless of whether employed or self-employed) with Dealer Net Finance Ltd in relation to Bribery.

Bribery

The Bribery Act 2010, which came into force on 1st July 2011, sets out the circumstances in which individuals may commit an offence of bribery. Generally, these are -

- Offering a bribe
- Promising to pay a bribe
- Giving a bribe
- Asking for a bribe
- Agreeing to receive a bribe
- Receiving a bribe

In these cases, a bribe is a payment (or other advantage) given to a person with the intention that they will act in an improper way. For example, to encourage someone to award a contract to one firm over another or to overlook matters such as poor credit history when giving advice.

It is also an offence to give, offer, promise, ask for, agree to receive or receive a payment as a reward for improper acts that have already happened. It doesn't even matter if the person who carried out the improper act understood that it was improper at the time.

Finally, it would also be an offence to act in an improper way if you thought you might receive anything, even if it hasn't been offered, and you haven't asked.

We have a zero-tolerance approach to Bribery. If you are offered any kind of gift or payment you must report this to Principal of Dealer Net Finance Ltd. Any gift, payment or hospitality valued at over £50 should be recorded in our Gift & Hospitality Register (£50 has been discussed and agreed by Dealer Net Finance Ltd and its advisers as being a reasonable maximum value to accept without being constituted as an influencing factor.

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www.dealernetfinance.co.uk

Dealer Net Finance Limited. Registered in England & Wales Reg. No: 5722918

Registered Office: Franklin House, Stockton Road, Sedgefield, Stockton-On-Tees, TS21 2AG

Director: H. Musgrave | Authorised and Regulated by the Financial Conduct Authority, Authorisation No: 660336

If in individual circumstances you consider that a gift of lower value might not be proper, then you should report this and seek further advice from our compliance officer).

Often such gifts may be intended innocently, for example, relationship building, corporate away days, or a thank you from a third party where you were genuinely doing your job. It is essential, however innocent you think they are, to follow this policy to make it clear that you accepted the gift or payment in good faith.

Reporting Bribery

If you are offered a gift, hospitality, or any other kind of advantage that you think may be intended to influence you, or you suspect that another person may be engaged in any kind of bribery, you must report this immediately.

To report a suspicion of bribery please put together all the information that you have and send it to Howard Musgrave.

If you are concerned about any repercussions of making a report, then you should refer to the Whistleblowing Policy of the FCA for information on alternative methods of making a report.

All notifications made will be handled with strict confidentiality. However, please note that there may be circumstances in which we are required to reveal an individual's identity, for example where we are compelled to do so by law and therefore anonymity cannot be guaranteed.

All notifications relating to other employees within Dealer Net Finance Ltd will be handled in line with the Public Interest Disclosure Act 1998.

Subsequent Investigation

Dealer Net Finance Ltd is committed to supporting regulators and law enforcement officers in the prevention of bribery and other financial crime.

All employees are expected to cooperate fully with any investigations; however, employees must also recognise that laws and procedures may apply to the disclosure of information and should therefore contact Howard Musgrave before disclosing information about customers or employees when contacted directly by law enforcement officers.

Failure to notify an appropriate person about criminal actions of which you are aware, in breach of this policy, may be considered to be a contractual breach leading to disciplinary actions.

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