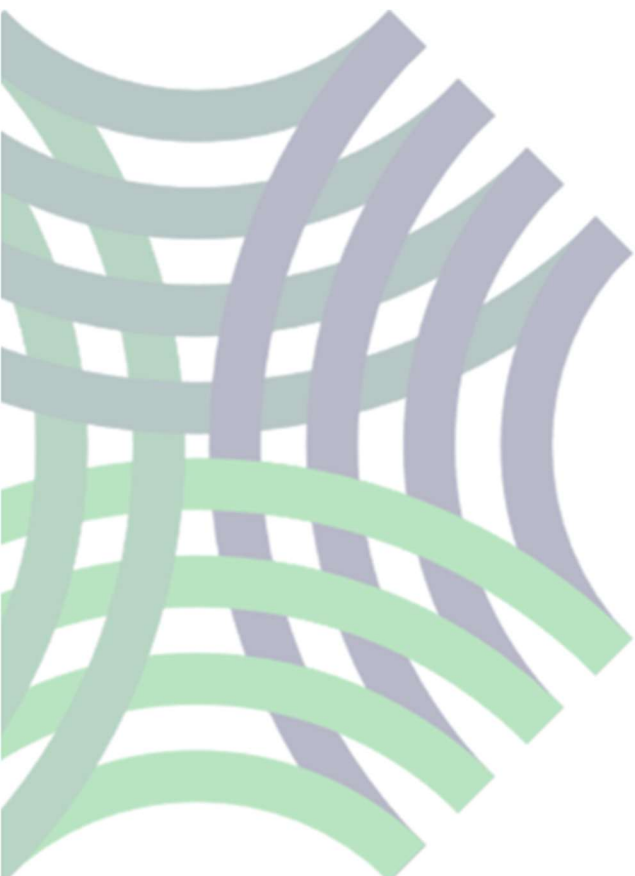




Walden Finance

Anti-Bribery & Corruption Policy



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Contents

1. Introduction	3
2. Defined terms	3
3. Our approach to anti-bribery corruption	3
4. What is bribery and corruption and the consequences of an offence	4
5. What is not acceptable	4
6. The risk to our business from bribery and corruption	5
7. How we mitigate the potential risks to our business from bribery and corruption	5
8. Ongoing monitoring and review.....	6



1. Introduction

This Anti-Bribery & Corruption Policy is made in accordance with the Bribery Act 2010, the requirements of our regulator, the Financial Conduct Authority, and guidance issued by the Ministry of Justice.

It explains what bribery and corruption is, the behaviours expected of those who either work for Walden Finance Limited, or act for or on its behalf, the consequences for breaching the Anti-Bribery & Corruption Policy and the systems and controls we have established and maintain in order to mitigate the risk to our business from bribery and corruption.

Walden Finance Limited enforce a zero-tolerance approach to bribery and corruption and are opposed to all forms of unethical behaviour.

2. Who this Anti-Bribery & Corruption Policy applies to

This Anti-Bribery & Corruption Policy applies to all individuals working for or on behalf of Walden Finance Limited, including consultants, contractors, agents and any other person who performs services (including third parties) on behalf of the business.

3. Defined terms

3.1. For the purposes of the Anti-Bribery & Corruption Policy the following defined terms apply:

“ABC Policy”	means this Anti-Bribery & Corruption Policy.
“FCA”	means the Financial Conduct Authority who regulates the financial services industry in the UK.
“facilitation payments”	means usually small, cash payments made to secure or speed up a routine or necessary action, or service level.
“third party”, “third-party” or “third parties”	means any individual or organisation that Walden Finance Limited comes into contact with during the course of our business and includes actual and potential clients, intermediaries, introducers of business, suppliers, distributors, business contacts, agents, advisers, government and public bodies and political parties.
“Walden Finance”, “we”, “us”, “our” or “business”	Walden Finance Limited trading as Walden Finance, a limited company registered in England and Wales under company number 12512184 with its registered office at 24 High Street, Saffron Walden, Essex, CB10 1AX.

4. Our approach to anti-bribery and corruption

4.1. Walden Finance Limited opposes all forms of bribery and corruption, whether undertaken directly or indirectly and are committed to taking steps to ensure that these do not occur in our business.



- 4.2. We take our responsibilities to deter, prevent, detect and respond to those who would seek to use our business to commit any form of financial crime, including bribery and corruption, very seriously and conduct our business with the highest standards of ethics and integrity.
- 4.3. Any employee found to be in breach of this ABC Policy will be subject to disciplinary action which could result in dismissal.
- 4.4. Any third party acting for or on our behalf found to be in breach of this ABC Policy may result in us terminating our relationship with them.

5. What is bribery and corruption and the consequences of an offence

Bribery

- 5.1. Bribery is offering, promising, giving, or accepting any gift, fee, reward or other advantage to or from any person or company either directly or indirectly in order to improperly gain any commercial, contractual, regulatory or personal advantage. It is encouragement to do something which is dishonest, illegal or a breach of trust and considered an offence under the Bribery Act 2010.
- 5.2. Bribery extends beyond the handling and management of cash and includes gifts, hospitality, entertainment, facilitation payments or kickbacks and political or charitable donations.
- 5.3. In summary, bribery is anything that extends beyond relationship building and could be construed as intended to influence a decision or business transaction.

Corruption

- 5.4. Corruption is a term used to describe a wide range of dishonest or fraudulent conduct of which bribery can be a part and is often associated with “the abuse of entrusted power for private gain”.

Consequences of an offence

- 5.5. If found guilty of an offence under the Bribery Act 2010, penalties could include up to 10 years in prison, or an unlimited fine, or both.
- 5.6. Walden Finance could also face prosecution and be liable to pay a fine under the Bribery Act 2010 if it fails to prevent bribery by its employees or a third party acting on its behalf.

6. What is not acceptable

- 6.1. Our employees and those third parties acting for or on behalf of Walden Finance are prohibited from:
 - a) promising, offering, paying, accepting or requesting a bribe, in any form
 - b) making facilitation payments, or accepting kickbacks



- c) promising, offering, paying, accepting or requesting gifts or hospitality to encourage preferential treatment, inappropriate behaviour or dishonest conduct
- d) making political contributions in order to gain an advantage in business
- e) making charitable donations or sponsorship payments in order to influence a decision by a third party, or bring about illicit activity in favour of our business
- f) threatening another employee or third party that has refused to commit a bribery offence; or
- g) taking any action to circumvent any controls established to deter, prevent, detect or respond to bribery.

7. The risk to our business from bribery and corruption

- 7.1. In creating our ABC Policy we have considered the sector we operate in, the complexity of our business and the potential areas of risk to our business from financial crime, in particular, bribery and corruption.
- 7.2. Walden Finance Limited is a UK based commercial finance broker authorised and regulated by the FCA, the regulator for the financial services industry in the UK.
- 7.3. We help clients and their advisors find, compare and apply for business and property finance.
- 7.4. We do not consider that our business activities possess a high risk of exposure to corruption or acts of bribery.
- 7.5. However, we take our responsibilities very seriously and have established and maintain appropriate systems and controls to mitigate the risk that our business is used to further financial crime, including bribery and corruption.

8. How we mitigate the potential risks to our business from bribery and corruption

- 8.1. The following represent potential areas of risk to our business and the systems, controls and policies we have introduced to mitigate them:

Gifts & Hospitality

- 8.2. The Anti-Bribery & Corruption Policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from third parties. However, any gift or hospitality:
 - a) must not be made with the intention of improperly influencing an employee or third party to obtain or retain business or a business advantage, or to reward the provision or retention of business, or a business advantage, or in explicit or implicit exchange for favours or benefits
 - b) must not include cash or a cash equivalent
 - c) must be given in the name of the organisation and not in an individual's name
 - d) must be appropriate in the circumstances; and
 - e) must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift.



Charitable donations and sponsorship

- 8.3. Charitable donations and sponsorship will be permitted but only where it is legal and ethical and where they are not directly linked to a business or individual or made in order to gain a commercial advantage.

Prospective clients

- 8.4. We gather detailed information about the background of our prospective clients and their businesses to assist us in preparing finance applications and to comply with current anti-money laundering regulations.
- 8.5. We will not work with any individual or organisation that has been found or is knowingly involved in bribery, corruption or financial crime.

Third-party relationships

- 8.6. Walden Finance work with a number of carefully selected suppliers.
- 8.7. These include UK lenders and finance providers, providers of complementary products or services, professional advisors including but not limited to accountants, solicitors, valuers, estate agents and architects and providers of services to our business including website hosting, telecommunications, accountancy services and administrative, regulatory and compliance support services.
- 8.8. We undertake due diligence on all third-party suppliers in order to satisfy ourselves that they are reputable, have a good track record, have the necessary skills and experience to perform their role and charge a fair market price for their services.
- 8.9. Where possible, we also include specific anti-bribery and corruption clauses in any contracts we enter into with third parties.
- 8.10. We will not work with any individual or organisation that has been found or is knowingly involved in bribery, corruption or financial crime.

9. Ongoing monitoring and review

- 9.1. Walden Finance reviews the Anti-Bribery & Corruption Policy at regular intervals but no less than annually to ensure that it remains suitable, adequate and effective in countering any risks of bribery and corruption. Where improvements are identified these are made as soon as possible.
- 9.2. On an ongoing basis Walden Finance:
- a) ensures that appropriate financial records are kept which evidence any gifts, hospitality, entertainment and any charitable payments offered, made and received, together with the business justification for acceptance



- b) monitors all employees and third-party relationships to ensure that they continue to demonstrate compliance with the Policy and have shared goals and objectives
- c) will investigate any suspicion of actual or potential bribery and corruption by either an employee or third party; and
- d) will takes steps to terminate the contract of any employee or third party where appropriate to do so, if they are not operating with honesty and integrity.