

The Bribery Act received Royal Assent on 8 April 2010 and came into force on 1 July 2011. The new Act reforms the criminal law to provide a new, modern and comprehensive scheme of bribery offences that will enable courts and prosecutors to respond more effectively to bribery at home or abroad.

The Act consolidates and extends the existing laws on bribery, defining four categories of offence

1. Bribing: the offering, promising or giving of a financial or other advantage to another person (whether in the public or private sector) in return for the improper performance of a function.
2. Being bribed: requesting, agreeing to receive or accepting a financial or other advantage in return for the improper performance of a function.
3. Bribing a foreign public official.
4. The 'corporate offence' of a commercial organisation failing to prevent 'associated' individuals or organisations (for example, employees, agents and subsidiaries) from committing any bribery offence.

Thomas Miller Investment (TMI) as part of the Thomas Miller Group has adopted a zero tolerance policy to bribery and corruption globally. The Thomas Miller Group policy is set out below;

Thomas Miller Group Anti-Bribery Policy

- The Bribery Act 2010 came into effect on 1 July, 2011 and has a worldwide impact upon the conduct of our businesses.
- The Board of Thomas Miller Holdings Ltd is committed to zero-tolerance in relation to any form of Bribery and Corruption.
- To achieve this objective Thomas Miller and all its associated businesses will work to identify and eliminate any form of bribery through a risk assessment process and ongoing monitoring and review.
- All employees are prohibited from soliciting, arranging or accepting bribes intended for the business and or employee's benefit or that of the employee's family, associates or acquaintances.
- This Policy extends to all the Group's business dealings and transactions in all countries, whether on its own behalf or on behalf of any business managed or operated, wholly or in part, by any Group company.
- This Policy is given force in a detailed anti-bribery programme which will be regularly revised to capture changes in law, reputation demands and changes in the business.
- Through the 'Whistle Blowing Policy' employees are encouraged to report any suspicion of bribery, safe in the knowledge that they are able to raise concerns and report violations in confidence and without risk of reprisal.