

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

### **1. Introduction**

Bellora Wealth Management (“the Company”) is committed to conducting its business with the highest standards of integrity, honesty, and transparency. This Anti-Bribery and Corruption Policy (“Policy”) sets out our zero-tolerance approach to bribery and corruption and outlines the responsibilities of all employees, officers, consultants, contractors, and business partners in observing and upholding this position.

This Policy supports our obligations under the UK Bribery Act 2010, and any other applicable anti-bribery and anti-corruption laws in jurisdictions where we operate.

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### **2. Purpose**

The purpose of this Policy is to:

- Ensure compliance with all relevant anti-bribery and anti-corruption legislation.
  - Establish controls to prevent bribery and corruption.
  - Promote ethical conduct in all aspects of our operations.
  - Provide guidance on recognizing and dealing with bribery and corruption risks.
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### **3. Scope**

This Policy applies to:

- All directors, officers, employees, and agents of the Company;
  - All subsidiaries and affiliates of the Company (where applicable);
  - All third-party service providers, consultants, subcontractors, and business partners acting on behalf of the Company.
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#### **4. Definition of Bribery and Corruption**

- Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for an action which is illegal, unethical, or a breach of trust.
- Corruption refers to any form of abuse of entrusted power for private gain.

Bribes can take the form of cash, gifts, hospitality, travel, donations, sponsorships, facilitation payments, or any other advantage.

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#### **5. Prohibited Conduct**

Under this Policy, the following are strictly prohibited:

- Offering, giving, or receiving a bribe in any form.
  - Making facilitation payments or unofficial payments to expedite routine governmental actions.
  - Offering or receiving excessive gifts, entertainment, or hospitality.
  - Using Company funds or resources for unlawful or unethical purposes.
  - Concealing or misrepresenting any transactions or accounting entries related to bribery or corruption.
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#### **6. Gifts, Hospitality and Expenses**

Gifts and hospitality may only be offered or accepted where they are:

- Reasonable, proportionate, and bona fide;
- Not intended to influence a business decision or obtain undue advantage;
- Compliant with local laws and customary business practices;
- Fully documented and reported in accordance with internal procedures.

Any gifts or hospitality exceeding the established threshold (e.g., £100) must be approved in writing by senior management.

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## **7. Charitable Donations and Sponsorships**

Charitable donations and sponsorships must not be used as a substitute for bribery. All contributions must be transparent, properly recorded, and made in good faith, and only to legitimate organizations. Political donations are strictly prohibited unless explicitly approved by the Board.

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## **8. Responsibilities**

### **8.1 Management Responsibilities**

Senior management shall:

- Promote a culture of compliance and integrity;
- Provide adequate resources and training;
- Monitor the effectiveness of this Policy;
- Investigate any reported breaches diligently and confidentially.

### **8.2 Employee Responsibilities**

All employees must:

- Familiarize themselves with this Policy;
  - Avoid any activity that might lead to a breach;
  - Report any concerns or suspicions of bribery or corruption promptly;
  - Complete any mandatory anti-bribery training sessions.
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## **9. Reporting Concerns**

Employees and third parties are encouraged to report suspected bribery or corruption in good faith through the following channels:

- Direct Manager or Compliance Officer;
- Email: [support@bellora-wealth.com](mailto:support@bellora-wealth.com)

The Company will ensure that no individual suffers any form of retaliation or reprisal for reporting concerns in good faith.

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## **10. Record Keeping**

The Company shall maintain accurate books and records reflecting all transactions and expenditures. All expenses related to gifts, hospitality, donations, and sponsorships must be supported by appropriate documentation and approval.

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## **11. Monitoring and Review**

This Policy shall be reviewed annually or as required to reflect changes in law, regulatory guidance, or business operations. Internal audits and assessments will be conducted periodically to ensure compliance.

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## **12. Disciplinary Action**

Any breach of this Policy by an employee will result in disciplinary action, up to and including termination of employment. Breaches by third parties may result in the termination of contractual relations and legal proceedings.

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## **13. Acknowledgement and Compliance**

All employees, officers, and relevant third parties are required to confirm in writing that they have read, understood, and agreed to comply with this Policy.