



GMS02-11-07 Anti-Bribery, Corruption and Fraud Policy

To all Lloyd's Register Group members' employees, directors, consultants, contractors, agents and joint ventures worldwide.

Good business ethics are integral to who we are and what we do. Everyone who works for or with a member of LR must work in a safe, ethical and lawful manner.

We will not be influenced as a result of corrupt activity we prize our independence and impartiality.

Further details of this policy are in the Guidance section, and related definitions are in GMS00-04 GMS Glossary.

Our policy is that we will:

- conduct all of our business in a professional, open, honest and ethical manner;
- take a zero-tolerance approach to bribery, corruption and fraud within LR;
- implement and enforce effective systems to counter bribery, and
- uphold all laws which counter bribery, corruption and fraud in all the countries in which we operate, including but not limited to:
 - UK Bribery Act 2010 (applicable everywhere we operate);
 - UK Fraud Act 2006, and
 - US Foreign Corrupt Practices Act 1977.

In support of this policy we:

- require all colleagues to undertake regular training in anti-bribery, corruption and fraud;
- ensure all accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, are prepared and maintained with strict accuracy and completeness;
- ensure no accounts are kept off-book to facilitate or conceal improper payments;
- require all colleagues to notify their Line Manager, and the Ethics and Compliance Committee via ethics@lr.org, as soon as possible if they believe that a breach of this policy has occurred or is intended;
- communicate our zero-tolerance approach to bribery, corruption and fraud to all suppliers, contractors and business contacts at the outset of our business relationship with them and as appropriate thereafter, and
- ensure that all colleagues comply with:
 - GMS01-02 Code of Ethics;
 - GMS02-11-01 Conflict of Interest Independence Impartiality and Integrity Policy;
 - GMS02-11-08 Anti-Facilitation of Tax Evasion Policy;
 - GMS03-11-01 Speaking Out;
 - GMS03-11-03 Gifts and Hospitality;
 - GMS03-11-40 Use of Agents, and
 - MMS03-04-49 Conflict of Interest.



Nick Brown, Chief Executive Officer, 5th May 2021