

Dunn and Baker - Bribery Act 2010 Firm's Policy

We are committed to running our firm fairly, openly, honestly and in accordance with our professional rules. It is an offence to offer or to receive benefits to induce another to act improperly. The firm has zero tolerance to any bribery received by or offered to partners or staff. To avoid any issues arising, the following guidelines should be applied:

1. CHARITABLE GIFTS

All gifts must be given prior approval and agreed at a partners meeting and to be made to appropriate organisations bearing in mind the nature and location of the firm's business. The amount paid to any one organisation will rarely exceed £1000. The gift will be recorded in the minutes of the partners' meeting and in the firms register.

2. HOSPITALITY/PRO BONO WORK

Hospitality and any pro bono work must always be reasonable and proportionate to improve the image of the firm or better to promote it. It will seldom exceed £100 per person. A register will be maintained by the Managing Partner of items charged to hospitality above that figure who must give prior approval.

3. PROMOTIONAL EXPENSES

Promotional expenses must be reasonable and proportionate. Prior approval must be given at a partners' meeting and recorded in the minutes.

4. REFERRALS

4.1 Payment of referral fees by us for publicly funded work is prohibited by our contracts with the LSC. However, when we are the instructed advocate we may negotiate a fee if outside advocates are used. No inadequate advocate may be instructed because they offer a larger fee for the work introduced. We often refer work to other firms in the expectation that they will do the same to us. We have informal 'conflicts' agreements. The referral must always be appropriate and on a professional basis. The approval of the Managing Partner must be obtained prior to any referral agreement being made.

4.2 The firm does have referral agreements in place with selected firms of estate agents. These agreements are monitored closely and are fully compliant with the Solicitors Code of Conduct. It is only the Managing partner who can approve and establish a referral agreement with another firm. The Managing Partner will ensure that the referral will always be appropriate and on a professional basis.

5. GIFTS

5.1 It will seldom be appropriate to give to non-charitable organisations or individuals. The prior approval of the Managing Partner is required who will arrange an entry in the register maintained by the Managing Partner. The amount will always be modest.

5.2 The firm maintains a register of gifts made to partners and members of staff. It is seldom appropriate to receive these whilst a case is on-going and they must be proportionate. The Proceeds of Crime Act must also be considered. The Managing Partners approval is required and must be recorded in the gifts register if a gift exceeds or is worth more than £100. Any gifts less than £100 need not be reported.

6. NEW WORK

When seeking new work it will rarely be appropriate to offer any financial or other inducement to make any contract with the firm more attractive. If any such inducement is contemplated prior approval from the Managing Partner must be obtained who will record it in the register if such approval is given.

7. OTHER ISSUES

Any payment or receipt for other reasons unconnected with individual case work must be given prior approval by the Managing Partner and recorded in the register maintained by the Managing Partner.

8. REVIEW AND MONITORING

The Equity Partners will review annually the gifts / hospitality register maintained by the Managing Partner beginning in the first quarter of 2012.

End.