

ETF ANTI-BRIBERY STATEMENT

The ETF is committed to carrying out our business fairly, honestly and openly and will not conduct ourselves in a manner that might reasonably be seen to compromise our personal judgement and integrity.

We value our reputation for ethical behaviour and financial probity. We will, under no circumstances tolerate the giving, receiving or soliciting of a bribe in any form. This applies to our staff, Trustees, third party individuals and organisations working on our behalf.

Our zero-tolerance approach to bribery, and commitment to the Bribery Act 2010, is set out in further detail within our Anti-Bribery Policy. All staff and appropriate third parties are required to familiarise themselves with the requirements surrounding this and for complying with this policy at all times.

Any instances of non-compliance will be dealt with firmly and staff are made aware of the possibility of internal disciplinary action, notwithstanding any sanctions for a criminal offence committed under the Bribery Act 2010.

We have signed up to the Chartered Institute of Procurement and Supply (CIPS) Corporate Code of Ethics¹, ensuring we support and comply with their commitment to reinforcing ethical values across all procurement and supply practices, including bribery, fraud and corruption.

We will not do business with anyone who does not support our anti-bribery commitments, and we reserve the right to terminate any contracts where there is evidence of acts of bribery having been committed. This is communicated to all third-party individuals and organisations working on behalf of the ETF at the outset of our business relationship with them and reinforced as appropriate thereafter.

If anyone is in doubt as to whether any conduct could amount to bribery, or if there are concerns or suspicions regarding bribery being / having been committed, staff should approach their line manager or the Governance Director in the first instance. Contracted suppliers and other third parties can contact us at enquiries@etfoundation.co.uk.

Suppliers also have the option to speak directly to their dedicated named ETF contact.

Reporting suspected issues is critical to the success of our anti-bribery measures and we will support anyone raising an issue, provided that they are acting in good faith.

¹ <https://www.cips.org/en-GB/cips-for-business/performance/ethics/corporate-code-of-ethics/>