

Introduction

The Financial Conduct Authority places a responsibility on all regulated firms to make sure that the firm cannot be used to further financial crime.

Fairstone Private Wealth (FPW) is committed to doing business ethically, with the highest standards of integrity, and expects its employees, advisers and business partners to work to these standards.

This policy sets out our employee's responsibilities in relation to Bribery. An 'employee' includes advising and non-advising staff and regardless of whether employed by Marketstar or self-employed).

Bribery

The Bribery Act 2010 sets out the circumstances in which individuals will commit the offence of Bribery. Generally, these are:

- Offering a bribe
- Promising to pay a bribe
- Giving a bribe
- Asking for a bribe
- Agreeing to receive a bribe
- Receiving a bribe.

In these cases a bribe is a payment (or other advantage) given to a person with the intention that they will act in an improper way. For example, to encourage someone to place business with one firm over another or to overlook matters such as poor credit history when giving advice.

It is also an offence to give, offer, promise, ask for, and agree to receive, or receive a payment as a reward for improper acts that have already happened. It doesn't even matter if the person who carried out the improper act understood that it was improper at the time.

Finally, it would also be an offence to act in an improper way if you thought you might receive anything, even if it hasn't been offered, and you haven't asked.

Marketstar has a zero tolerance approach to Bribery.

We maintain a Gifts and Inducements Register at Head Office. If you are offered anything that could be deemed a gift, hospitality or an inducement to do business valued at more than £75 then you must report this to the Compliance Director.

Reporting bribery

If you are offered a gift, hospitality, or any other kind of advantage valued above £75, that you think may be intended to influence you, or you suspect that another person may be engaged in any kind of bribery you must report this immediately.

To report a suspicion of bribery please complete the [Bribery Notification Form](#) and send it to the Group Operations Director

If you are concerned about any repercussions of making a report then you should refer to the [Whistleblowing Policy](#), described in the Compliance Manual, for information on alternative methods of making a report.

All notifications made to a person or department will be handled with strict confidentiality. However, please note that there may be circumstances in which we are required to reveal an individual's identity, for example where we are compelled to do so by law and therefore anonymity cannot be guaranteed.

All notifications relating to other employees within Marketstar will be handled in line with the Public Interest Disclosure Act 1998.

Subsequent investigation

Fairstone is committed to supporting regulators and law enforcement in the prevention of bribery and other financial crime.

All employees are expected to cooperate fully with any investigations; however, employees must also recognise that laws and procedures may apply to the disclosure of information and should therefore contact the Group Operations Director before disclosing information about customers or employees when contacted directly by law enforcement.

Fairstone takes the responsibility to combat bribery very seriously.

Failure to notify an appropriate person about criminal actions of which you are aware, in breach of this policy, will be considered to be a contractual breach leading to disciplinary action.

'Marketstar' is a trading name of Fairstone Private Wealth Ltd. which is authorised and regulated by the Financial Conduct Authority - FRN 457558.

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