

**Marex Spectron Anti-Bribery and Corruption statement of ethics**

**September 2016**

Dear Colleagues,


Marex Spectron's boards of directors and senior management unequivocally condemn bribery and corruption in all forms and circumstances and will not tolerate it in Marex Spectron's business or in those for, with or through whom Marex Spectron conducts business – whether UK or overseas members of staff, actual or potential customers, counterparties, intermediaries, public officials, suppliers, advisors or anyone else who provides services to or on the Group's behalf.

Marex Spectron believes that at the macro level bribery and corruption can and does undermine democracy and the rule of law, leads to violations of human rights, distorts markets, erodes the quality of life and allows organised crime, terrorism and other threats to human security to flourish. At the micro level, bribery and corruption can and does undermine the dignity and reputations of all those involved, the continuation of trading relationships and leads to expensive and damaging litigation, criminal and regulatory penalties.


If we suspect bribery or other corruption, our zero tolerance policy means that we shall immediately take all steps available to us to terminate forthwith the relevant employment or business relationship and involve the relevant authorities.

The UK Bribery Act 2010 came into force in July 2011 and is amongst the toughest anti-corruption legislation in the world. The geographical scope of the act is huge. It does not matter where in the world a bribe is offered or received, whether the bribe is direct or indirect via a third party or even whether it is directly related to activities in the UK.

In the event that you become aware of circumstances that suggest the Marex Spectron Group, and/or any other person for, with or through whom we conduct business, may have engaged in bribery (whether the bribe was given or received) or other corruption, it is important that the concern is investigated fully and promptly, and so please contact a member of the Group Compliance department without delay.



Simon Heale, Chairman



Ian Lowitt, Chief Executive