

MESSAGE FROM THE CHAIRMAN:

Ethics Statement

Dear All,

At Gullands we pride ourselves on our reputation for acting fairly and ethically wherever we do business. Our reputation is built on our values as a firm and the values of our employees and our collective commitment to acting with integrity throughout our organisation. We are a long-established and prominent firm of solicitors in Maidstone and conduct business throughout Kent and the South East. We also have a number of clients who operate on a nationwide basis.

We are dedicated to winning new business – but not at any cost; we value our high net worth clients but we maintain our independence from them; we enjoy good relations with our suppliers but we do business with them for the right reasons.

Gullands have a zero tolerance towards bribery and corruption. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

We have now produced a firm-wide Anti-Corruption and Bribery Policy, which is being included at paragraph 1.13 of the office manual. All staff will be distributed with a hard copy. We will also be providing training for all staff. Any employee who breaches our anti-corruption policy will face disciplinary action, which could result in dismissal for gross misconduct.

The policy contains certain procedures and will be monitored and reviewed periodically.

If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, then you should contact the Compliance Partner, Leroy Bradley. You will not be penalised for speaking out.

Under the Bribery Act 2010, there are severe consequences for being convicted of bribery in terms of both imprisonment and fines for individuals and also an unlimited fine for commercial organisations. Our policies and procedures are as much for the protection of individual members of the firm as well as for the firm as a whole.

Blair Gulland

Chairman.

01 July 2011