

Document ID: BA-POL-003
Title: Ethics & Anti-Bribery
Version: v2.0
Status: APPROVED
Owner: Butterfly Advisory
Approved by: Giedre Beige



Ethics & Anti-Bribery

Last updated: 19 February 2026

Butterfly International Ltd (trading as Butterfly Advisory) is committed to acting with integrity and to conducting business ethically, transparently, and lawfully. We take a zero-tolerance approach to bribery and corruption.

1) Our standard

We do not offer, promise, give, request, or accept bribes or improper advantages in any form. This includes cash, gifts, hospitality, commissions, favours, or any other benefit intended to influence a decision improperly.

We also do not tolerate facilitation payments (unofficial payments to speed up routine actions).

2) Who this applies to

This policy applies to anyone working with or representing Butterfly, including:

- Employees and contractors
- Associates, advisers, and partner specialists
- Agents, introducers, and suppliers (where relevant)

We expect partners and suppliers to uphold equivalent standards.

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3) Gifts and hospitality

Gifts and hospitality must be **reasonable, proportionate, and never intended to influence** business decisions.

Not permitted:

- Anything that could create a sense of obligation or influence an outcome
- Cash or cash equivalents (gift cards, vouchers, crypto)
- Lavish, frequent, or secretive entertainment
- Gifts/hospitality during sensitive moments (e.g., tendering, negotiations, approvals)

If in doubt, decline the offer and report it.

4) Conflicts of interest

We aim to avoid conflicts of interest. Where a conflict exists or could be perceived, it must be disclosed and managed.

This includes situations where:

- A personal relationship could influence decision-making
- A financial interest could affect impartiality
- A referral fee/commission arrangement could be perceived as influencing recommendations

Where relevant, we disclose fees or commissions during the client journey and provide further information on request (see **Fees & Commission Disclosure**).

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5) Third parties, introductions and referral arrangements

Bribery risks often arise through third parties. We take care to work with reputable partners and expect them to act ethically. We do not permit:

- Payments intended to secure improper introductions or preferential treatment
 - Hidden or undisclosed incentives
 - Any arrangement that would compromise fairness, independence, or client outcomes
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6) Reporting concerns (Speak Up)

If you suspect bribery, corruption, unethical conduct, or improper pressure, report it promptly. Reports will be handled sensitively.

Email: dpo@butterfly-advisory.com

Telephone: 020 7060 0604

Post: Butterfly International Ltd (trading as Butterfly Advisory), Cardinal Point, Park Road, Rickmansworth, Hertfordshire, WD3 1RE, United Kingdom

We do not tolerate retaliation against anyone who raises a concern in good faith.

7) Consequences

Breaches of this policy may result in:

- Immediate termination of working relationships (where applicable)
 - Reporting to relevant authorities or professional bodies where required
 - Legal action where appropriate
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8) Review and ownership

This policy is owned by Butterfly management and reviewed periodically to ensure it remains effective and aligned with legal and regulatory expectations.

Approved by: Giedre Beige, Director

Company: Butterfly International Ltd (trading as Butterfly Advisory)