

LIQ03

# Notice of progress report in voluntary winding up



Companies House

WEDNESDAY



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15/05/2019

#360

COMPANIES HOUSE

## 1 Company details

Company number 0 4 2 4 4 8 0 2

Company name in full Paintasset Limited

→ Filling in this form

Please complete in typescript or in  
bold black capitals.

## 2 Liquidator's name

Full forename(s) Lee Anthony

Surname Green

## 3 Liquidator's address

Building name/number King Street House

Street 15 Upper King Street

Post town Norwich

County/Region

Postcode N R 3 1 R B

Country

## 4 Liquidator's name ①

Full forename(s) Andrew Anderson

Surname Kelsall

① Other liquidator

Use this section to tell us about  
another liquidator.

## 5 Liquidator's address ②

Building name/number King Street House,

Street 15 Upper King Street

Post town Norwich

County/Region

Postcode N R 3 1 R B

Country

② Other liquidator

Use this section to tell us about  
another liquidator.

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**6** Period of progress report

From date	<sup>d</sup> 1	<sup>d</sup> 7	<sup>m</sup> 0	<sup>m</sup> 2	<sup>y</sup> 2	<sup>y</sup> 0	<sup>y</sup> 1	<sup>y</sup> 8
To date	<sup>d</sup> 1	<sup>d</sup> 6	<sup>m</sup> 0	<sup>m</sup> 2	<sup>y</sup> 2	<sup>y</sup> 0	<sup>y</sup> 1	<sup>y</sup> 9


**7** Progress report

☒ The progress report is attached

**8** Sign and date

Liquidator's signature

Signature

X  X

Signature date

<sup>d</sup> 1	<sup>d</sup> 4	<sup>m</sup> 0	<sup>m</sup> 5	<sup>y</sup> 2	<sup>y</sup> 0	<sup>y</sup> 1	<sup>y</sup> 9
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# LIQ03

## Notice of progress report in voluntary winding up



### Presenter information

You do not have to give any contact information, but if you do it will help Companies House if there is a query on the form. The contact information you give will be visible to searchers of the public record.

Contact name **Lee Anthony Green**

Company name **Larking Gowen LLP**

Address **King Street House**  
**15 Upper King Street**

Post town **Norwich**

County/Region

Postcode **N R 3 1 R B**

Country

DX

Telephone **01603 624181**



### Checklist

**We may return forms completed incorrectly or with information missing.**

**Please make sure you have remembered the following:**

- ☐ The company name and number match the information held on the public Register.
- ☐ You have attached the required documents.
- ☐ You have signed the form.



### Important information

**All information on this form will appear on the public record.**



### Where to send

**You may return this form to any Companies House address, however for expediency we advise you to return it to the address below:**

The Registrar of Companies, Companies House,  
Crown Way, Cardiff, Wales, CF14 3UZ.  
DX 33050 Cardiff.



### Further information

For further information please see the guidance notes on the website at [www.gov.uk/companieshouse](http://www.gov.uk/companieshouse) or email [enquiries@companieshouse.gov.uk](mailto:enquiries@companieshouse.gov.uk)

**This form is available in an alternative format. Please visit the forms page on the website at [www.gov.uk/companieshouse](http://www.gov.uk/companieshouse)**

## Joint Liquidators' Summary of Receipts & Payments

NIL

**55,175.58**

2,737.33

**55,175.58**

Heen

Lee Anthony Green  
Joint Liquidator

**PAINTASSET LIMITED (FORMERLY GRADIENT CAPITAL LIMITED) - IN CREDITORS' VOLUNTARY LIQUIDATION**

**JOINT LIQUIDATORS' PROGRESS REPORT TO CREDITORS AND MEMBERS FOR THE YEAR ENDING 16 FEBRUARY 2019**

**STATUTORY INFORMATION**

Company name:	Paintasset Limited
Registered office:	King Street House 15 Upper King Street Norwich NR3 1RB
Former registered office:	52 Cornhill London EC3V 3PD
Registered number:	04244802
Joint Liquidators' names:	Lee Anthony Green and Andrew Anderson Kelsall
Joint Liquidators' address:	King Street House 15 Upper King Street Norwich NR3 1RB
Joint Liquidators' date of appointment:	17 February 2017
Actions of Joint Liquidators'	Any act required or authorised under any enactment to be done by a Liquidator may be done by either or both of the Liquidators acting jointly or alone.

**JOINT LIQUIDATORS' ACTIONS SINCE LAST REPORT**

In the period I have collected in the final payment due in respect of the sale of the Company's investment.

I have collected in all payments due in respect of the settlement with Scott Pagel in the period. Further details relating to this can be found in the assets section below.

With the assistance of my solicitors, Howes Percival LLP ("Howes Percival"), I have also liaised and reached settlements with both Ivor Farman, a former Director, and a former employee, whose identity I am not at liberty to disclose, in respect of claims I brought against them. Further details in respect of these matters can be found in the assets section below.

I have also collected in a balance of cash held in the Company bank accounts in the period.

I have declared 2 dividends to the non-preferential unsecured creditors in the period. Details of these dividends can be found in the dividend prospects section below.

I am required by the insolvency legislation to undertake certain work in connection with the liquidation that provides no financial benefit for the creditors. A description of the routine work undertaken since my last progress report is contained in Appendix 1.

## **RECEIPTS AND PAYMENTS**

My Receipts & Payments Account for the period from 17 February 2018 to 16 February 2019 is attached at Appendix 2.

The balance of funds are held in an interest bearing estate bank account.

## **ASSETS**

### Investment

As previously reported, the Company held a 23% investment in Gradient Capital Partners LLP ("GCP LLP"), an LLP associated with Scott Pagel, the Director of the Company. Negotiations were held with Mr Pagel, the result of which was an agreement that he would pay £500,000.00 in respect of the investment in GCP LLP.

I confirm that in the reporting period I received the second and final instalment of £250,000.00, and I have therefore now received the full settlement balance of £500,000.00.

### Claims against Directors

As previously reported, my solicitors and I held a meeting with Scott Pagel, with regards to the Company's claim against him, and a cash settlement was agreed. I confirm that all payments due under the settlement, totalling £600,000.00, have been received from Mr Pagel. As part of the settlement agreement Scott Pagel also agreed to both remove his claim in the Liquidation, which was included in the Statement of Affairs for £9,364.00, and that GCP LLP would not submit a claim in the Liquidation. GCP LLP were included in the Statement of Affairs for £107,743.00

I also had a similar claim against the former Director, Ivor Farman, and my solicitors and I held a settlement meeting with him in September 2018 in respect of this. A settlement was agreed at the meeting that he would pay £450,000.00 by way of 2 instalments due in October and November 2018.

Shortly after the agreement was reached, Mr Farman's solicitors requested an amendment to the payment deadline; this was due to the lack of immediately available funds to settle the balance due under the agreement by the payment deadlines. I agreed to extend the deadline to 01 June 2019, on the proviso that interest would accrue on the sum due from 01 January 2019. This was agreed and all parties have now signed the settlement agreement to this effect.

No payments have been made by Mr Farman yet, however I am aware that his ability to make payments are subject to certain assets being disposed of. Mr Farman has regularly kept me updated and hopes to be able to make at least a part payment in May 2019.

#### Claim against former employee

I also brought a claim against one of the former employees of the Company, however as part of the settlement agreement made with the individual I am not at liberty to disclose either their identity or details of the agreement itself.

I can however confirm that payment in full in respect of the settlement agreement has been received.

#### Cash at Bank

I was contacted by the Company's bankers in the reporting period and they advised me that they held a credit balance in respect of the Company,

I have therefore received £461.45 in respect of funds held in the Company's bank accounts in the period.

#### Gross bank interest

To date I have received gross bank interest of £89.81 in respect of the balance of funds held in the Liquidation bank account, £76.37 of which has been accrued in this reporting period.

### **LIABILITIES**

#### Secured Creditors

An examination of the Company's mortgage register held by the Registrar of Companies, showed that the Company has no current charges over its assets.

The legislation requires that if the Company has created a floating charge after 15 September 2003, a prescribed part of the Company's net property (i.e. the money that would otherwise be available to the charge holder) should be ring-fenced for distribution to unsecured creditors. In this case there were no creditors secured by a floating charge such that the prescribed part provisions do not apply.

#### Preferential Creditors

The Statement of Affairs did not anticipated any preferential creditors. Accordingly, no preferential Claims have been received.

#### Crown Creditors

The Statement of Affairs included £2,243,541.49 owed to HMRC. HMRC's final claim of £2,256,118.60 has been received.

#### Non-preferential unsecured Creditors

The Statement of Affairs included three non-preferential unsecured creditors, excluding those detailed above, with an estimated total liability of £126,471.00.

As previously reported, both Scott Pagel and GCP LLP agreed to waive their entitlement to claim in the Liquidation, as part of the settlement agreement reached with Mr Pagel.

I have received a claim for £9,364.00 from the other creditor listed on the Statement of Affairs.

All creditors who were detailed on the Statement of Affairs have now either submitted a claim or agreed to waive their entitlement to claim.

## **DIVIDEND PROSPECTS**

There are no secured, preferential, or floating charge creditors and I am therefore unable to declare dividend for these classes of creditor.

I have declared the following dividends to the non-preferential unsecured creditors in the period:

<b>DATE</b>	<b>AMOUNT OF DIVIDEND (£)</b>	<b>DIVIDEND RATE (p in the £)</b>
14 May 2018	329,693.99	14.61
21 June 2019	382,511.07	16.95
<b>TOTAL</b>	<b>712,205.06</b>	<b>31.56</b>

It is anticipated that further dividends will be payable to the non-preferential unsecured creditors upon receipt of future realisations.

## **INVESTIGATION INTO THE AFFAIRS OF THE COMPANY**

I undertook an initial investigation into the Company's affairs to establish whether there were any potential asset recoveries or conduct matters that justified further investigation, taking account of the public interest, potential recoveries, the funds likely to be available to fund an investigation, and the costs involved. Specifically, I recovered, listed and reviewed the Company's accounting records; obtained and reviewed copy bank statements for the period of 2 years prior to the Company ceasing to trade from the Company's bankers; and compared the information in the Company's last set of accounts with that contained in the statement of affairs lodged in the liquidation and made enquiries about the reasons for the changes.

There were no matters that justified further investigation in the circumstances of this appointment.

Within three months of my appointment as Liquidator, I am required to submit a confidential report to the Secretary of State to include any matters which have come to my attention during the course of my work which may indicate that the conduct of any past or present Director would make them unfit to be concerned with the management of the Company. I confirm that my report has been submitted.

## **PRE-APPOINTMENT REMUNERATION**

The Board previously authorised the payment of a fee of £5,000.00 for the assistance of Begbies Traynor (Central) LLP with preparing the Statement of Affairs and convening and holding the creditors meeting to place the Company into Liquidation and to appoint a Liquidator.

The fee for preparing the Statement of Affairs and convening and holding the creditors meeting to place the Company into Liquidation and to appoint a Liquidator was paid by the Company prior to the Liquidation.



## JOINT LIQUIDATORS' REMUNERATION

My remuneration was approved on a fixed fee of £17,500.00 for my work in respect of Administration & Planning, Investigations and Creditors.

I have drawn £17,500.00 to 16 February 2019, none of which was drawn in the period since 17 February 2018 in respect of work done for which my fees were approved as a fixed fee.

I was authorised to draw a further fixed fee of £5,000.00 for every 12 months that the Liquidation remains open following the first anniversary. I have drawn £5,000.00 to date in respect of this fixed fee, all of which was drawn in the period since 17 February 2018.

I was also authorised to draw 15% of net realisations for my work in respect of the realisation of all assets. Based on realisations I achieved I am entitled to remuneration of £163,714.52.

I have drawn £162,307.31 to 16 February 2019, £128,330.15 of which was drawn in the period since 17 February 2018 in respect of work done for which my fees were approved as a percentage of realisations.

Further information about creditors' rights can be obtained by visiting the creditors' information micro-site published by the Association of Business Recovery Professionals (R3) at <http://www.creditorinsolvencyguide.co.uk/>. A copy of 'A Creditors Guide to Liquidators' Fees' also published by R3, together with an explanatory note which shows Larking Gowen LLP's fee policy are available at the link [www.larking-gowen.co.uk/insolvency](http://www.larking-gowen.co.uk/insolvency) and you will need to click on 'Click here for insolvency information and guidance' to the right of the page. Please note that there are different versions of the Guidance Notes and in this case you should refer to the April 2017 version.

## JOINT LIQUIDATORS' EXPENSES

I have incurred expenses of £31,929.03 to date, £20,731.16 of which was incurred in the period since 17 February 2018.

I have drawn £31,857.13 to date, £21,634.74 of which was drawn in the period since 17 February 2018.

I have incurred the following expenses in the period since my last progress report:

Type of expense	Amount incurred/ accrued in the reporting period (£)
Legal Fees	19,972.50
Legal Disbursements	679.00
Postage	1.65
Storage Costs	6.95
Land Registry Fees	3.00
Train Fare	65.70

I have incurred the following category 2 disbursements in the period since my last progress report:

Type of category 2 disbursement	Amount incurred/ accrued in the reporting period (£)
Photocopying	2.34

I have used the following agents or professional advisors in the reporting period:

<b>Professional Advisor</b>	<b>Nature of Work</b>	<b>Basis of Fees</b>
Howes Percival	Solicitors	Time costs plus Conditional Fee Agreement ("CFA")

The choice of professionals was based on my perception of their experience and ability to perform this type of work and the complexity and nature of the assignment. I also considered that the basis on which they will charge their fees represented value for money. I have reviewed the charges they have made and am satisfied that they are reasonable in the circumstances of this case.

In the period Howes Percival have assisted me in bringing my claims against both Ivor Farman and a former employee of the Company, specifically they have advised on the merits of my claims, negotiated with their solicitors on my behalf, attended settlement meetings with me, and drafted the necessary settlement agreements in each matter. Their fees in the period have totalled £19,972.50 and they have incurred disbursements of £679.00.

<b>Nature of expense</b>	<b>Estimated expenses (£)</b>	<b>Expenses incurred to date (£)</b>
Statutory Advertising	159.00	234.50
Statutory Bonding	930.00	930.00
Postage	17.04	6.85
Valuation Costs	350.00	350.00
Investigation Agents	362.00	362.00
Photocopying	6.20	8.82
Train Fares	Nil	274.81
Subsistence	Nil	15.00
Legal Fees	Unknown	28,935.30
Legal Disbursements	Nil	801.80
Storage Costs	Nil	6.95
Land Registry Fees	Nil	3.00
<b>Total</b>	<b>1,824.24</b>	<b>31,929.03</b>

As you can see from the information provided in this report, the expenses I have incurred in this matter to date have exceeded the total expenses I estimated I would incur when my remuneration was authorised by the creditors. The reason I have exceeded the expenses estimate is because my initial estimate did not include an amount for legal fees, nor was any estimate given for train fares or subsistence.

#### **FURTHER INFORMATION**

An unsecured creditor may, with the permission of the Court, or with the concurrence of 5% in value of the unsecured creditors (including the creditor in question), request further details of the Joint Liquidators' remuneration and expenses within 21 days of their receipt of this report. Any secured creditor may request the same details in the same time limit.

An unsecured creditor may, with the permission of the Court, or with the concurrence of 10% in value of the unsecured creditors (including the creditor in question), apply to Court to challenge the amount of remuneration charged by the Joint Liquidators as being excessive, and/or the basis of the Joint Liquidators' remuneration, and/or the amount of the expenses incurred as being excessive, within 8 weeks of their receipt of this report. Any secured creditor may make a similar application to court within the same time limit.

To comply with the Provision of Services Regulations, some general information about Larking Gowen LLP can be found in the attached summary sheet.

## **SUMMARY**

The Liquidation will remain open until I have received the funds due from the settlement with Ivor Farman, and subsequently declared a fourth and final distribution to the non-preferential unsecured creditors. I estimate that this will take approximately 9 months, however this will be dependent on when the funds due under the settlement agreement are forthcoming. Once these matters are resolved the Liquidation will be finalised and our files will be closed.

If creditors have any queries regarding the conduct of the Liquidation, or if they want hard copies of any of the documents made available on-line, they should contact Brandon Herod either by telephone on 0330 024 0888, or by email at [brandon.herod@larking-gowen.co.uk](mailto:brandon.herod@larking-gowen.co.uk).

A handwritten signature in black ink, appearing to read 'L. Green', with a stylized, flowing script.

**Lee Anthony Green**  
**JOINT LIQUIDATOR**

## **Appendix 1**

### **1. Administration**

- Case planning - devising an appropriate strategy for dealing with the case and giving instructions to the staff to undertake the work on the case.
- Setting up electronic case files.
- Setting up the case on the practice's electronic case management system and entering data.
- Issuing the statutory notifications to creditors and other required on appointment as office holder, including gazetting the office holder's appointment.
- Obtaining a specific penalty bond.
- Convening and holding general meetings of creditors and members (as applicable).
- Dealing with all routine correspondence and emails relating to the case.
- Opening, maintaining and managing the office holder's estate bank account.
- Creating, maintaining and managing the office holder's cashbook.
- Undertaking regular bank reconciliations of the bank account containing estate funds.
- Reviewing the adequacy of the specific penalty bond on a quarterly basis.
- Undertaking periodic reviews of the progress of the case.
- Overseeing and controlling the work done on the case by case administrators.
- Preparing, reviewing and issuing annual progress reports to creditors and members.
- Filing returns at Companies House.
- Preparing and filing VAT returns.
- Preparing and filing Corporation Tax returns.

### **2. Creditors**

- Obtaining information from the case records about employee claims.
- Completing documentation for submission to the Redundancy Payments Office.
- Corresponding with employees regarding their claims.
- Liaising with the Redundancy Payments Office regarding employee claims.
- Dealing with creditor correspondence, emails and telephone conversations regarding their claims.
- Maintaining up to date creditor information on the case management system.
- Issuing a notice of intended dividend and placing an appropriate gazette notice.
- Reviewing proofs of debt received from creditors, adjudicating on them and formally admitting them for the payment of a dividend.
- Requesting additional information from creditors in support of their proofs of debt in order to adjudicate on their claims.
- Calculating and paying a dividend to creditors, and issuing the notice of declaration of dividend.
- Paying tax deducted from the dividends paid to employees.

**Paintasset Limited**  
**(In Liquidation)**  
**Joint Liquidators' Summary of Receipts & Payments**

Statement of Affairs £	From 17/02/2018 To 16/02/2019 £	From 03/02/2017 To 16/02/2019 £	
	ASSET REALISATIONS		
	Bank Interest Gross	76.37	89.81
	Cash at Bank	461.45	461.45
200.00	Fixtures & Fittings	NIL	200.00
	Funds from Begbies Traynor	NIL	1,104.00
Uncertain	Investments	250,000.00	500,000.00
1,800.00	Office Equipment	NIL	1,800.00
NIL	Other debtors	NIL	NIL
	Settlement with Ivor Farman	NIL	NIL
	Settlement with Scott Pagel	600,000.00	600,000.00
	Settlement with former employee	16,800.00	16,800.00
		867,337.82	1,120,455.26
	COST OF REALISATIONS		
	Agents/Valuers Fees	NIL	350.00
	Investigations Agents fees	NIL	362.00
	Legal Disbursements	679.00	801.80
	Legal Fees	19,972.50	28,935.30
	Office Holders Remuneration-% Fee	128,330.15	162,307.31
	Office Holders Remuneration-Fixed Fee	NIL	17,500.00
	Photocopying	2.34	8.82
	Postage	1.65	6.85
	Specific Bond	900.00	930.00
	Statutory Advertising	75.50	234.50
	Storage Costs	3.75	3.75
	Subsistence	NIL	15.00
	Train Fare	NIL	209.11
		(149,964.89)	(211,664.44)
	UNSECURED CREDITORS		
(18,728.00)	Directors	NIL	NIL
(107,743.00)	Gradient Capital Partners LLP	NIL	NIL
(2,243,541.49)	HM Revenue & Customs (PAYE/NIC)	712,205.06	853,615.24
		(712,205.06)	(853,615.24)
	DISTRIBUTIONS		
(2.00)	Ordinary Shareholders	NIL	NIL
		NIL	NIL
(2,368,014.49)		5,167.87	55,175.58
	REPRESENTED BY		
	Current A/c (BoS)		52,438.25
	Vat Receivable		2,737.33
			55,175.58



Lee Anthony Green  
Joint Liquidator

**General insolvency information referred to in the accompanying report and links to websites referred to in the report**

**Information about creditors' rights**

Further information about creditors' rights can be obtained by visiting the creditors' information micro-site published by the Association of Business Recovery Professionals (R3) at <http://www.creditorinsolvencyguide.co.uk/>.

**Information about how an Office Holder's fees may be approved**

Details about how an office holder's fees may be approved for each case type are available in a series of guides issued with Statement of Insolvency Practice 9 (SIP 9) and can be accessed at <https://www.larking-gowen.co.uk/what-we-offer/by-service/insolvency-recovery/> and you will need to click on 'Click here for insolvency information and guidance' to the right of the page.

Further details are also provided in the Larking Gowen LLP practice fee recovery sheet at <https://www.larking-gowen.co.uk/what-we-offer/by-service/insolvency-recovery/> and you will need to click on 'Click here for insolvency information and guidance' to the right of the page.

If you would like a paper copy of the relevant guide then please write to Insolvency & Recovery, Larking Gowen LLP, King Street House, 15 Upper King Street, Norwich, NR3 1RB at the above address, email [insolvency@larking-gowen.co.uk](mailto:insolvency@larking-gowen.co.uk) or phone 0330 024 0888 and ask for the Insolvency & Recovery department.

**Information about creditors' Committees**

Further information about the role of the creditors' Committee and what might be expected from its members is available at the link <https://www.larking-gowen.co.uk/what-we-offer/by-service/insolvency-recovery/> and you will need to click on 'Click here for insolvency information and guidance' to the right of the page.

**The Insolvency Code of Ethics**

Insolvency Practitioners, when carrying out all professional work relating to an insolvency appointment, are bound by The Insolvency Code of Ethics which can be found at <https://www.gov.uk/government/publications/insolvency-practitioner-code-of-ethics>

**The Institute of Chartered Accountants Code of Ethics (ICAEW)**

Andrew Kelsall and Lee Green and all bound by the regulations of their professional body, The ICAEW, which can be found at <http://www.icaew.com/en/technical/ethics/icaew-code-of-ethics/icaew-code-of-ethics>.

**Professional rules that apply to the Office Holders**

Statements of Insolvency Practice (SIPs) are a series of guidance notes issued to licensed insolvency practitioners with a view to maintaining standards by setting out required practice. Details of the SIPs can be found at <http://www.icaew.com/en/technical/insolvency/insolvency-regulations-and-standards/statements-of-insolvency-practice-sips-england>. Further details of the regulations set by The ICAEW are at <http://www.icaew.com/en/technical/insolvency/sips-regulations-and-guidance>.

### **Complaints Procedure**

At Larking Gowen LLP we always strive to provide a professional and efficient service. However, we recognise that it is in the nature of insolvency proceedings for disputes to arise from time to time. As such, should you have any comments or complaints regarding the administration of this case then in the first instance you should contact me at the address given in your letter.

If you consider that I have not dealt with your comments or complaint appropriately you should then put details of your concerns in writing to our complaints officer Andrew Burwood, Larking Gowen LLP, King Street House, 15 Upper King Street, Norwich, NR3 1RB. This will then formally invoke our complaints procedure and we will endeavour to deal with your complaint under the supervision of a senior partner unconnected with the appointment.

Most disputes can be resolved amicably either through the provision of further information or following negotiations. However, in the event that you have exhausted our complaints procedure and you are not satisfied that your complaint has been resolved or dealt with appropriately, you may complain to The Insolvency Service Complaints Gateway which covers Insolvency Practitioners regulated by, among other regulatory bodies, the ICAEW. The complaints procedure can be found at <https://www.icaew.com/about-icaew/act-in-the-public-interest/complaints-process/make-a-complaint> and by selecting the 'My complaint relates to insolvency work' section.

You may submit your complaint in writing to IP Complaints, 3rd Floor, 1 City Walk, Leeds, LS11 9DA, or you can make a submission using an on-line form available at [www.gov.uk/complain-about-insolvency-practitioner](http://www.gov.uk/complain-about-insolvency-practitioner); or you can email [insolvency.enquiryline@insolvency.gsi.gov.uk](mailto:insolvency.enquiryline@insolvency.gsi.gov.uk) or you may phone 0300 678 0015. Information on the call charges that apply is available at <https://www.gov.uk/call-charges>.

### **Indemnity insurer**

In accordance with the disclosure requirements of the Provision of Services Regulations 2009 our principal professional indemnity insurer is AIG Europe Limited who can be contacted via our brokers Howden UK Group Limited, 71 Fenchurch Street, London EC3M 4BS. The territorial and jurisdictional coverage is worldwide.

### **Privacy Policy**

Larking Gowen LLP's privacy policy can be found at <https://www.larking-gowen.co.uk/privacy-and-cookie-policy>.

### **VAT number**

Larking Gowen LLP's VAT number is 105 7234 96.

### **Bribery Act 2010**

Larking Gowen LLP is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on Larking Gowen LLP's behalf is responsible for maintaining our reputation and for conducting company business honestly and professionally.

Larking Gowen LLP take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.

Larking Gowen LLP requires all those who are associated with it to observe the highest standards of impartiality, integrity and objectivity.

Larking Gowen LLP prohibits anyone acting on its behalf from:

- bribing another person. A bribe includes the offering, promising or giving of any financial or other type of advantage;
- accepting a bribe. This includes requesting, agreeing to receive or accepting any financial, or another kind of advantage;
- bribing a foreign public official; and
- condoning the offering or acceptance of bribes.

Larking Gowen LLP will:

- avoid doing business with others who do not accept our values and who may harm our reputation;
- maintain processes, procedures and records that limit the risk of direct or indirect bribery;
- promote awareness of this policy amongst its staff, those acting on its behalf and entities with which it has any commercial dealings;
- investigate all instances of alleged bribery, and will assist the police, and other authorities when appropriate, in any resultant prosecutions. In addition, disciplinary action will be considered against individual members of staff;
- review this policy regularly and update it when necessary.