



Anti-Bribery and Anti-Corruption Policy.

Introduction

The Company is committed to implementing and enforcing effective systems to counter bribery and corruption therefore the Company has put this policy in place to ensure that all aspects of its business is always dealt with in an honest and ethical manner. The Policy is in place to support with the Bribery Act 2010, to maintain the highest possible standards of business practice and to ensure team members are aware of the Company's "zero-tolerance" approach to bribery and corruption of any kind.

The purpose of this policy is to provide you with the information you need to understand what acceptable and unacceptable practices are when working for this Company.

The Company will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage
- Provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of their duties.
- Make or accept "kickbacks" of any kind either before or after a transaction has occurred.

What is covered?

This policy details what is meant by bribery and corruption in the workplace, what you should do as a team member if you believe you have witnessed anything suspicious, and the outcome should a team member be found to have committed bribery or corruption whilst working.

Who is the policy for?

This policy applies to all team members, self-employed team, contractors, suppliers, and agency workers. If any associate is found to be involved in bribery or corruption a director will be informed immediately and action taken. This policy does not form part of our team members terms and conditions of employment and we reserve the right to amend this policy at any time. We reserve the right to adapt and amend the procedure according to the circumstances of the incident raised.

Note: *If you have any suspicions around bribery and corruption then please speak to a Director or Human Resources immediately.*

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The Legalities of Bribery and Corruption

Under United Kingdom Law (UK Bribery Act 2010) bribery and corruption is punishable for any individuals found guilty by up to ten years imprisonment and/or a fine. If the Company is found to have taken part in the corruption or lacks adequate procedures to prevent bribery, it could face an unlimited fine, damage to its reputation and be excluded from tendering for Government contracts.

Bribery

This is the offer, promise, giving, demanding or acceptance of an advantage i.e., such as an inducement for action which is illegal, unethical or a breach of trust.

Corruption

This is the misuse of public office or power for private gain, or the misuse of private power in relation to business outside the realm of government.

Acts of bribery and corruption are designed to influence the individual in the performance of their duty and incline them to act dishonestly.

“Kickbacks”

These are typically payments made in return for a business favour or advantage or the offer of such an advantage.

The Company will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage team members to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery or corruption will not suffer any detriment as a result; even if they turn out to be mistaken unless the action is shown to be malicious.

Team Member’s Responsibilities

Team members must **not**:

- Accept or request any financial or other reward from any person in return for providing some favour.
- Give or offer any financial or other reward to any person in return for receiving some favour, reward or advantage.
- Give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure.

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Team members must:

- Report any offer of a gift, payment, or reward of any value to their director who is required to keep accurate records to include the date, company or individual making the offer, team member offered the gift or reward (including details of what was offered), and whether or not the gift was accepted.
- Give any items offered over £50 (or unwanted gifts under £30) to Human Resources to be used for the benefit of the company.

Team members failing to observe this policy will be dealt with under the disciplinary procedure and this could lead to a warning or other action up to and including dismissal.

Any other individuals e.g. self-employed, contractors, suppliers etc. in breach of this policy will be dealt with by a Senior Manager in the appropriate manner.

What does Gifts and Hospitality mean?

This policy does not prohibit giving and receiving promotional gifts of low value (under £50) or normal and appropriate hospitality provided that all such actions are open and transparent.

Receiving Cash Gifts – Team members must only accept a drink if the order is processed through the till and a receipt obtained. The drink may be consumed at the end of the shift and cannot be saved for another day. Team members must **not** receive any gift prior to completing work and all work for customers must be carried out through the Company with a Director's approval.

Receiving Business Gifts – Receiving promotional gifts of low value (under £50) is normal and appropriate however, any promotional gifts need to be authorised by your Director before accepted. Any gift offered and then refused due to their value being higher than £50 must be reported to your Director.

Offering Business Gifts – Business gifts are primarily aimed at thanking customers and suppliers for their custom and loyalty and only gifts authorised by a Director may be given.

Receiving Hospitality – The acceptance of corporate hospitality must be transparent and authorised by a Director. All invitations must be reported to the Company before a team member can accept and the following areas are exempt while attending conferences or seminars, sponsored by third parties:

- Business and travel expenses incurred.
- Normal business lunches and meals

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Offering Hospitality – Company hospitality is primarily aimed at thanking customers and suppliers for their custom and loyalty and all events must be approved by a Director.

Donations to Organisations – No donation should be made to charities, political parties or other organisations without approval from a Director.

Monitoring this Policy

The policy will be monitored on an ongoing basis to ensure that it addresses any issues raised effectively and quickly. All team members working for the Company will be monitored and advised on the contents of this policy, which is also referred to in the Team Member Handbook. A Director will assess any reported incidents or related occurrence, investigate and advise the team member who reported the incident of next steps.

Confidentiality

We always take confidentiality very seriously and expect all those involved in an incident to uphold this. This includes you not sharing items with others while your concerns are being investigated.

Record keeping

Records will be kept of the incident raised, any action taken and the reason for the action taken. These records are confidential and will be processed in accordance with our Data Protection Policy.

If you have any questions regarding this process, please speak to your Director or Human Resources.

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Last Updated: April 2024

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