

MONICA VINADER



## ANTI BRIBERY POLICY



## 1. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the company conducts its business in a socially responsible manner.

We expect all employees to familiarise themselves with this policy. Any employee that breaches this policy will face investigation in accordance with our Disciplinary Policy and any non-employee who breaches this policy may have their contract terminated with immediate effect.

## 2. What is bribery?

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an incentive for action, which is illegal or a breach of trust. A bribe is an incentive or reward offered, promised or provided in order to gain any commercial and/or contractual advantage. A bribe can take many forms including but not limited to money, gift, loan, hospitality, services, discounts, or the aware of a contract.

It is our company policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all of the jurisdictions in which we operate. However we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and globally.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. We therefore take our legal responsibilities very seriously.

## 3. Scope

### 3.1. Who is covered by this policy?

This policy applies to all individuals working for the company, including but not limited to permanent, fixed-term and/or temporary employees, contractors, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (herein collectively referred to as "employees" in this policy).

In this policy, third party means any individual or organisation that an employee comes into contact with during the course of work for the company, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisors, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

### 3.2. What is covered in this policy?

This policy covers bribes, gifts, hospitality, political contributions and charitable contributions.

#### 3.2.1. Bribes

Employees must not engage in any form of bribery, either directly or through any third party. Employees must not engage in bribery in any part of the world.

#### 3.2.2. Gifts and Hospitality

Employees must not offer or give any gift or hospitality which could be regarded as illegal or improper or which violates our or the recipient's policies.

Employees may not accept any gift or hospitality from any third party if there is any suggestion that a return favour will be expected or implied.



If it is not appropriate to decline the offer of a gift, the gift may be accepted provided it is then declared and handed over to the HR Team. The HR Team will log receipt of the gift in the company's gift register. Any gift will be raffled to employees with the proceedings of the raffle going to charity. This includes all gifts given to any employee, including personal gifts, regardless of type and value. The only exception to this is perishable gifts (i.e. chocolates), which can be consumed by the employee and shared across employees within the receiving locations.

Employees are welcome to accept invitations to corporate hospitality events. Employees must declare such invitations to the HR Team and seek prior written approval from their manager to attend. The HR Team will log details of corporate hospitality events in the gift registry.

We appreciate that the practice of giving business gifts and hospitality varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable.

The intention behind the gift shall always be considered and clarified. Within these parameters, local management may define specific guidance to reflect local professional and industry standards. Any local guidance must receive approval from the senior management team and all gifts must be logged in the gift register.

### 3.2.3. Political contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain improper business advantage.

### 3.2.4. Charitable contributions

Charitable support and donations are acceptable, and encouraged, whether in kind services, knowledge, time or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation may be made or offered without the approval of a member of the senior management team.

All charitable donations must be disclosed to the Finance Team.

## 4. Your responsibilities

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might leave to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future.

Any employee who breaches this policy will be investigated in accordance with our Disciplinary Policy, this could result in dismissal for gross misconduct.

We reserve our right to terminate our contractual relationship with third parties in they are found to be in breach of this policy.

### 4.1. Record keeping

We must keep financial records and have appropriate internal controls in place, which will evidence the company's business reason for making any payments to third parties.

You must declare to the HR Team any hospitality or gifts offered and/or accepted.

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You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our Expenses Policy and recorded with reason for expenditure.

All accounts, invoices and other documents relating to dealings with this parties, such as clients, suppliers and business contracts should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

## 5. How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your manager or a member of the senior management team.

## 6. What to do if you are a victim of bribery or corruption

It is important that you tell your manager or a member of the senior management team as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe you are the victim of another form of unlawful activity.

## 7. Protection

Employees who refuse to accept or offer a bribe, of those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future.

## 8. Training and communication

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

## 9. Who is responsible for this policy?

The senior management team has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all employees comply with it. The senior management team is responsible for ensuring that their direct reports are aware of and understand this policy.

The Finance and HR Teams have primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

## 10. Monitoring and reviewing

The senior management team will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and value. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All employees are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger and wrongdoing. Employees are invited to comment on this policy and to suggest improvements to the senior management team.

Signed: Gabriela Vinader  
Gabriela Vinader (Jun 21, 2021 13:07 GMT+1)

Date: Jun 21, 2021

Gabriela Vinader, Managing Director

# Anti-Bribery Policy

Final Audit Report

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