

Anti-Bribery and Corruption Policy

1. Introduction

Mondottica aims to provide clarity to all staff regarding policy obligations, entitlements, and expectations, ensuring all staff fully understand and benefit from the policy provision. We will ensure our policies are up to date, to provide you with the appropriate guidance, and in return expect you to read and comply to the guidance or rules.

Our Company Values: Integrity, Respect, Customer and Excellence underpin our policies and if you have feedback or questions on how they may be improved please contact the policy owner.

The purpose of the Anti-Bribery and Corruption policy is to give guidance on our commitment to avoiding such acts and to support you in understanding the main areas of liability under the Bribery Act 2010, the responsibilities of staff and associated persons acting for, or on behalf of, Mondottica and the consequences of any breaches of this policy.

2. Scope

This policy applies to all Employees (full or part-time) whether permanent or temporary, all Consultants, Volunteers, Interns, Directors and Board members. (for the purposes of this policy collectively known as 'Staff'). Additionally, it applies to all agents and subsidiaries acting for, or on behalf of, Mondottica ("associated persons") within the UK and overseas. All staff and associated persons acting for, or on behalf of, Mondottica is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of Mondottica.

'Mondottica', 'We', or 'Us', will be used interchangeably within this document.

Unless otherwise stated this policy is non-contractual.

3. General

Mondottica is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy outlines Mondottica position

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on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. Mondottica will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. We are committed to implementing effective measures to prevent, monitor and eliminate bribery.

Mondottica may also face criminal liability for unlawful actions taken by staff or associated persons under the Bribery Act 2010. All staff and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time by Mondottica.

4. Policy

4.1 The Bribery Act 2010

Mondottica is committed to complying with the Bribery Act 2010 in its business activities in the UK and overseas.

Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the:

- intention of inducing or rewarding improper performance of a function or activity; or
- knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any activity performed in the course of a person's employment, or on behalf of another organisation or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed under the Bribery Act 2010 if:

- Staff or an associated person acting for, or on behalf of, Mondottica offers, promises, gives, requests, receives or agrees to receive bribes; or
- Staff or an associated person acting for, or on behalf of, Mondottica offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of their duties (where local law does not permit or require such influence); and
- Mondottica does not have the defence that it has adequate procedures in place to prevent bribery by its staff or associated persons.

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All staff and associated persons are required to comply with this policy, in accordance with the Bribery Act 2010.

4.2 What is prohibited?

Mondottica prohibits staff or associated persons from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or organisation, whether a public or government official, official of a state-controlled industry, political party or a private person or organisation, regardless of whether the staff or associated person is situated in the UK or overseas. The bribe might be made to ensure that a person or organisation improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual or regulatory advantage for Mondottica in either obtaining or maintaining organisation business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties.

4.3 Records

Staff are required to take particular care to ensure that all Company records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials. Further, accurate and detailed records of all corporate hospitality, entertainment or gifts accepted or offered should be kept (refer to expense policy for more information).

Appropriate due diligence should be undertaken prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative.

4.4 Working overseas

Staff conducting business on behalf of Mondottica outside the UK may be at greater risk of being exposed to bribery or unethical business conduct than UK-based staff and therefore should be extra - vigilant when conducting international business.

While any suspicious circumstances should be reported, staff are required particularly to report:

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- close family, personal or business ties that a prospective agent, representative or joint-venture partner may have with government or corporate officials, directors, or employees.
- a history of corruption in the country in which the business is being undertaken.
- requests for cash payments.
- requests for unusual payment arrangements, for example via a third party.
- requests for reimbursements of unsubstantiated or unusual expenses; or
- a lack of standard invoices and proper financial practices.

If staff are in any doubt as to whether or not a potential act constitutes bribery, the matter should be referred to either the COO or HR Director.

4.5 Facilitation payments

Mondottica prohibits staff from making or accepting any facilitation payments. These are payments made to government officials for carrying out or speeding up routine procedures. They are more common overseas. Facilitation payments are distinct from an official, publicly available fast-track process. Facilitation payments, or offers of such payments, will constitute a criminal offence by both the individual concerned and Mondottica under the Bribery Act 2010, even where such payments are made or requested overseas. Staff are required to act with greater vigilance when dealing with government procedures overseas.

In the event that a public official has requested a payment, staff should ask for further details of the purpose and nature of the payment in writing and discuss the next steps with either the COO or HR Director. If the public official refuses to give these, this should be reported to the COO or HR Director.

If written details are provided, we may authorise payments if they are of a legitimate nature, otherwise requests for facilitation payments should be refused and reported if appropriate.

If staff have any other concerns about the nature of a request for payment, they should report it to the COO or HR Director, and in accordance with Mondottica's whistleblowing policy.

4.6 Corporate entertainment, gifts and hospitality

Mondottica permits corporate entertainment, gifts, hospitality, and promotional expenditure that is undertaken:

- for the purpose of establishing or maintaining good business relationships.

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- to improve the image and reputation of Mondottica; or
- to present Mondottica's products effectively

provided that it is:

- arranged in good faith; and
- not offered, promised or accepted to secure an advantage for Mondottica or any of its staff or to influence the impartiality of the recipient.

Mondottica will authorise reasonable, appropriate and proportionate entertainment and promotional expenditure, and with clear business objectives, and will not approve any business entertainment that is considered a conflict of interest, or where it could be perceived that undue influence, or a particular business benefit was being sought (for example prior to a tendering exercise).

This principle applies to staff, whether based in the UK or overseas. However, those with remits overseas may be required to follow additional or different local legislation and should always make themselves aware of the appropriate policy or procedures to follow.

Staff should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates and gain prior approval, in line with our expenses policy, detailing the objectives of the proposed expenditure and who will be attending.

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers or other business contacts should be notified, to your line manager. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and staff may be asked to return the gifts to the sender or refuse the entertainment, for example where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained.

If staff wish to provide gifts to suppliers, clients or other business contacts, prior written approval from the CEO or COO is required, together with details of the intended recipients, reasons for the gift and business objective. These will be authorised only in limited circumstances and will be subject to a cap of £50 per recipient. Records and receipts must be supplied as per the expense policy.

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4.7 Charitable and political donations

Mondottica considers that charitable giving can form part of its wider commitment and responsibility to the community. Mondottica may support a number of charities that are selected from time to time and may support fundraising events involving employees, however staff should not make any charitable or political donations to organisations on behalf of Mondottica, and this should be done via our events committee.

4.8 Risk management

Mondottica will conduct risk assessments for each of its key business activities as appropriate, and where relevant, will identify employees or officers of Mondottica who are in positions where they may be exposed to bribery, e.g., identify high-risk areas, projects undertaken in high-risk countries, tenders for work and those working on high-value projects.

4.9 Reporting suspected bribery

Mondottica depends on staff to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Staff are requested to assist Mondottica and to remain vigilant in preventing, detecting, and reporting bribery.

You are encouraged to report any concerns that they may have to your line manager or the HR Director as soon as possible. Issues that should be reported include:

- any suspected or actual attempts at bribery.
- concerns that other employees or associated persons may be being bribed; or
- concerns that other staffs or associated persons may be bribing third parties, such as clients or government officials.

Any such reports will be thoroughly and promptly investigated by an appropriate person in the strictest confidence, and staff will be required to assist in any investigation into possible or suspected bribery.

Anyone reporting instances of bribery in good faith will be supported by Mondottica and we will ensure that the individual is not subjected to detrimental treatment as a consequence of their report. Further information can be found in our Whistleblowing policy. If you have any concerns under this policy you should report it to the HR Director or COO

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Action by Mondottica

Mondottica will fully investigate any instances of alleged or suspected bribery. We reserve the right to suspend staff from duties during any investigation. We will use our disciplinary procedures where any member of staff is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. Mondottica may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, Mondottica who are found to have breached this policy.

We may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police. Mondottica will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

4.10 Training and monitoring:

We will review this policy in accordance with the review schedule, and:

- Ensure our anti bribery measures are communicated to staff.
- Provide training where appropriate.
- Monitor and review related procedures on a regular basis including internal financial systems, expenses, corporate hospitality, gifts and entertainment policies.

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