

Anti-Bribery & Anti-Corruption Policy

We're committed to making sure we reduce opportunities for bribery, fraud and corruption to the lowest possible level of risk, and will not accept any level of bribery, fraud, corruption or any other criminal activity.

What is bribery, fraud and corruption?

- Bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favour, or a financial or other advantage from another to influence business outcome improperly, to induce or reward improper conduct or to gain any commercial, contractual, regulatory or personal advantage. It can be direct or indirect through Third Parties.
- Fraud can be defined as dishonest conduct with the intention to make gain, cause a loss, or cause the risk of a loss to another. Existing offences such as theft, corruption, false accounting, forgery, counterfeiting and blackmail continue to be offences under previous relevant legislation.
- Corruption is defined as the offering, giving, soliciting, or acceptance of an inducement or reward, which may influence any person to act inappropriately. Colleagues should be aware that they may be exposed to corrupt activity in a variety of ways, for example the offer of bribes, coercion, blackmail and false accounting.

The nature of how we work means that colleagues need to be aware of the risk of allegations of corruption and for this reason, we have strict rules for giving and receiving any hospitality and gifts.

How to report suspicions of bribery, fraud and corruption ...

In the event that a colleague discovers, or has suspicions that fraud or corruption is occurring within the workplace, they should immediately inform their direct Line Manager in the first instance. Failing that, a member of the Risk and Compliance team or through our confidential whistleblowing helpline.

Modern Slavery & Human Trafficking Policy

We take the issue of modern slavery and human trafficking extremely seriously and prohibit all forms of slavery in both our own Company and our supply chains, which is why we have introduced an updated policy with a Procurement & Corporate Responsibility Code of Conduct for Suppliers included.

What is slavery, servitude and human trafficking?

- Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or powers attaching to the right ownership are exercised.
- Servitude is the obligation to provide services that are imposed using coercion. This includes the obligation to provide services that are imposed by the use of coercion, the obligation for a serf to live on another person's property and the impossibility of changing his or her condition.
- An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even when the victim consents to the travel.

The prevention, detection and reporting of modern slavery in any part of our Company or supply chain is the responsibility of all those working for us or on our behalf and we encourage everyone to raise concerns about any issue or suspicion in any parts of our business or supply chains of any suppliers.