



POLICY/PROCEDURE	Anti-Bribery Policy
VERSION	3.0
POLICY WRITTEN BY	Karen Skelton
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INTRODUCTION

An anti-bribery policy is a formal document or set of guidelines implemented by organizations to prevent bribery and corruption within their operations. Bribery involves the offering, giving, receiving, or soliciting of something of value (such as money, gifts, or favours) to influence the actions of an individual or entity in a position of authority or trust, often for personal or improper gain.

1. ANTI-CORRUPTION AND BRIBERY POLICY

- 1.1 It is our policy to conduct all of our business in an honest and ethical manner. We 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 and implementing and enforcing effective systems to counter bribery.
- 1.2 We will uphold all laws relevant to countering bribery and corruption, including the Bribery Act 2010, in respect of our conduct both at home and abroad.
- 1.3 It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine. As an employer if we fail to prevent bribery we can face an unlimited fine, exclusion from tendering for public contracts, and damage to our reputation. We therefore take our legal responsibilities very seriously.

What is Bribery?

- 1.4 A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Gifts and Hospitality

- 1.5 This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

The giving or receipt of gifts is not prohibited, if the following requirements are met:

- 1.5.1 it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- 1.5.2 it complies with local law;
- 1.5.3 it is given in our name, not in your name;
- 1.5.4 it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- 1.5.5 it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- 1.5.6 taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time; and
- 1.5.7 it is given openly, not secretly.
- 1.5.8 The gift is £20 or below in value.

We appreciate that the practice of giving business gifts 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 should always be considered.

What is not acceptable?

- 1.6 It is not acceptable for you (or someone on your behalf) to:
- 1.6.1 give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
 - 1.6.2 give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
 - 1.6.3 accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
 - 1.6.4 accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
 - 1.6.5 threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
 - 1.6.6 engage in any activity that might lead to a breach of this policy.

Your Responsibilities

- 1.7 You must ensure that you read, understand and comply with this policy.
- 1.8 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 workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 1.9 You must notify your Department Head as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 1.10 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

How to raise a concern

- 1.11 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, these should be raised with your Department Head. Concerns should be reported by following the procedure set out in our Reporting Wrongdoing Policy. A copy of our Reporting Wrongdoing Policy can be found in the handbook.

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

- 1.12 It is important that you tell your Department Head 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 that you are a victim of another form of unlawful activity.

Signed,



Print Name: **D R WASHBOURNE**

Position: Chief Executive Officer **ON BEHALF OF GERBER GOLDSCHMIDT GROUP (UK) LIMITED, BEESWIFT LIMITED AND BEESWIFT BV**



Print Name: **M BEALE**

Position: Financial Director **ON BEHALF OF GERBER GOLDSCHMIDT GROUP (UK) LIMITED, BEESWIFT LIMITED AND BEESWIFT BV**