



## ANTI BRIBERY AND CORRUPTION POLICY

**Note from: Alex Whitehouse, Chief Executive Officer**

*Premier's policy is to conduct all our business in an honest and ethical manner and 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 are committed to implementing and enforcing effective systems to counter bribery and corruption.*

*We will uphold all laws relevant to countering bribery and corruption in all the countries in which we operate.*

A handwritten signature in blue ink, appearing to be "Alex Whitehouse", is positioned above the printed name.

**Alex Whitehouse**

**Chief Executive Officer**

**December 2025**

This policy is designed to:

- (a) set out Premier Foods' Group companies' ("Premier") responsibilities and that of our employees in observing and upholding our position on bribery and corruption; and
- (b) provide information and guidance for our employees on how to recognise and deal with bribery and corruption issues.

**If you have questions about this policy or have an issue you wish to discuss, please contact:**

**Simon Rose, General Counsel, [simon.rose@premierfoods.co.uk](mailto:simon.rose@premierfoods.co.uk)**

**Samantha Sawyer, Deputy General Counsel, [samantha.sawyer@premierfoods.co.uk](mailto:samantha.sawyer@premierfoods.co.uk)**

In the alternative if you wish to make a confidential disclosure, call the dedicated “speak up” helpline, Safecall on 0800 915 1571.



## To whom does this policy apply?

This policy applies to all members of staff at all levels, including permanent and temporary employees of Premier, and all agency and interim staff.

## Why is this policy important?

It is a criminal offence to offer, promise, give, request, or accept a bribe. If found guilty, you can be punished by up to 12 years’ imprisonment and/or be given a fine.

### Consequences for Premier

As an employer, if Premier fails 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.

### Consequences for member of staff

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

## What is bribery and corruption?

Bribery is offering, promising, giving or accepting any financial or other advantages of any kind, to encourage that person to act improperly in the performance of their functions, or to reward them for acting improperly, or to reward that person for having acted improperly by accepting the advantage.

Advantages include: money, gifts, loans, fees, hospitality (e.g. an invitation to attend a sporting event), services, discounts, the award of a contract or anything else of value.

Corruption is the abuse of entrusted power or position for private gain.

### Examples

**Offering a bribe:** You offer a potential customer tickets to a major sporting event, but only if they agree to do business with us.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. Premier may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential customer to accept your offer.

**Receiving a bribe:** An existing supplier gives your nephew a job but makes it clear that in return they expect you to use your influence in Premier to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

## What you must not do

It is not acceptable for you or someone acting on your behalf to:

- ❖ give, promise 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;
- ❖ give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
- ❖ accept a payment, gift or hospitality from a third party that you know, or suspect, is offered with the expectation that we will provide a business advantage for them or anyone else in return;
- ❖ accept hospitality from a third party that is unduly lavish or extravagant under the circumstances;
- ❖ offer or accept a gift to or from government officials or representatives, or politicians or political parties without the prior approval of your manager;
- ❖ threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy;
- ❖ make facilitation payments (see below); or
- ❖ engage in any other activity that might lead to a breach of this policy.

## YOUR RESPONSIBILITIES

### Gifts and Hospitality

Premier has many customers, distributors and suppliers. They are vital to our success and our relationships with these third parties must be based entirely on sound business decisions and fair dealing.

Occasionally, you may be offered, or offer, gifts and/or hospitality. Premier's policy is to allow reasonable and appropriate hospitality and gifts in certain circumstances, providing certain procedures are followed.

#### In summary:

- ❖ no gift should be offered or received which is lavish, excessive or might be interpreted to be a bribe or pay-off.

- ❖ Premier employees **must seek specific approval from their Line Manager, which must be documented in writing (for example, via email) and should be retained by employees, for:**
  - any individual gifts valued at **over £150**
  - or a **number of gifts (each valued at less than £150)** that are given or received in any 12 month period from the same individual or company etc that are valued in **aggregate at over £500**.
  - There is a de minimis of £10 so anything valued at £10 or below does not need to be recorded.
  
- ❖ **ensure that the provision, or receipt, of all gifts or hospitality** of any value, is recorded on the Gifts and Hospitality Register (please see Guidance Note 1 for more detail on the procedure in place for recording on the Gifts & Hospitality Register) for all employees (job grades 0 – 3, plus personal assistants to the Executive Leadership Team). The approval of any gift or hospitality, given or received, must be recorded in writing and the employee must retain a copy of such approval.

## Due Diligence on Third Parties

It is essential that Premier knows exactly with whom we are doing business and to consider if there is any anti-corruption risk posed.

We engage with third parties to provide us with services directly or on our behalf. For example, a supplier based in Turkey who supplies us with raisins, or a UK based logistics company providing haulier services.

### Steps to take:

- ❖ **All new business partners** must be made aware, in writing, of Premier's anti-corruption code of conduct before any dealings with them begin.

### **New business partners due diligence:**

- ❖ 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.**
- ❖ We must also carry out due diligence, using questionnaire at Guidance Note 4, on all new business partners. A report must be prepared and provided to your Line Manager and Legal Team for their review.
- ❖ We must also ensure that business partners have strict anti-corruption policies and procedures in place.

### **Ongoing due diligence:**

- ❖ All business partners, new and existing, must periodically provide a completed anti-bribery and corruption questionnaire while we work with them.

More guidance on due diligence of business partners is available at Guidance Note 2 – Due Diligence. Specific guidance on due diligence with an international focus is available at Guidance Note 3.

## Facilitation Payments

Facilitation payments are payments designed to induce public officials to perform routine functions that they are otherwise obligated to perform. These can be in the form of money, gifts or anything else of value.

### Example

You travel abroad to discuss listing products in a local retailer. At the airport, a customs official says you have to pay them \$50 in order for them to allow you to enter the country but you have already paid for a visa prior to your visit. The payment by you of the \$50 would be an illegal as it's a facilitation payment.

**Facilitation payments are illegal.** They are not common in the UK but may be a risk in some other jurisdictions in which we operate. The country in which a facilitation payment is made is irrelevant because the payment would breach English law and potentially the local law of the country in which the payment is made.

Premier's policy is that no company member of staff or any third parties with whom Premier does business should make a facilitation payment.

### Remember:

- ❖ The payment may need to be made if you are put under duress but it then needs to be documented and reported to the Legal team as soon as practicable.

If you have any suspicions, concerns or queries regarding a payment, you should raise these with your Line Manager and a member of the Legal Team.

Additionally, or in the alternative you may contact the dedicated "speak up" hot line Safecall as described below in the "How to raise a concern" section.

## Charities and Political Donations

### Charitable Donations

If you are asked to give money to a charity nominated by another company, the charity must fall into Premier's eligibility criteria. For more information on the criteria, please see the **Charitable Giving**

**Policy**, available on Premier’s What’s Cooking intra-net website. It must always be made clear that any such donation does not give rise to anything being received in return.

### **Political and Religious Donations**

Premier does not make any donations to political parties, religious groups or causes supported by a specific party or group. A “donation” can mean anything of value including money, employee time, materials or even membership of a political organisation.

## **How to raise a concern**

Individuals who refuse to accept or offer a bribe, or who raise concerns or report another’s wrongdoing, are sometimes worried about repercussions. **Premier encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.**

Safecall is Premier’s confidential “speak up” helpline. It provides a professional, independent and confidential means of reporting employee concerns. All calls are treated in confidence by staff independent of Premier who will assure your anonymity.

The Safecall telephone number is **0800 915 1571**

If you are offered a bribe, or are asked to make one, or if you believe or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your manager or the Legal Team, or report it through the confidential helpline as soon as possible.

If you are unsure about whether a particular act constitutes bribery or corruption, raise it with your manager or the Legal Team, or through the confidential helpline.

## **Training programme**

Training on anti-bribery is provided to colleagues working in roles where this could be relevant, such as procurement and business development. The relevant employees will be required to carry out training sessions on a regular basis during their employment with Premier.

## **Monitoring and oversight**

### **Line Managers are responsible for ensuring colleagues:**

- ❖ are reminded from time to time of their obligation to comply with the anti-bribery and corruption policy;
- ❖ maintain an accurate and up to date gifts and hospitality records;
- ❖ conduct appropriate due diligence on all third party business partners if applicable;
- ❖ conduct periodic due diligence reviews of existing business partners; and
- ❖ conduct initial due diligence on all new business partners

See the Guidance Notes for more details on due diligence.

## **Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

In certain circumstances, certain conduct may be reported to relevant authorities.

**Premier Foods plc**

**December 2025**

For further guidance please see:

**Guidance Note 1 – Gifts and Hospitality**

**Guidance Note 2 – Due Diligence – General**

**Guidance Note 3 – Due Diligence with an International Focus**

**Guidance Note 4 – Anti-Bribery and Corruption Questionnaire**

## Guidance Note 1 – Gifts and Hospitality

### Introduction

“Gifts, Entertainment or Hospitality” means anything of value. For example, this includes drinks, meals and other forms of corporate hospitality, prizes, holiday offers and gift vouchers. These examples are simply by way of illustration but the potential list is endless.

Business gifts and hospitality can help build goodwill in a commercial relationship, but they can also make it harder to be objective about the person providing them and may create a conflict of interest between the provider and recipient. Under some circumstances providing gifts and hospitality could be seen as bribery.

When a gift or hospitality is extraordinary, lavish or may potentially influence or reward improper performance then it may breach the UK’s Bribery Act 2011. If you believe or are uncertain about whether the gift or hospitality may breach anti-bribery law and this policy, you should report it to your Line Manager and the Legal Team or call Safecall for further guidance.

### Receiving gifts and hospitality - the general rules

Premier’s policy is to allow reasonable and appropriate hospitality and gifts in certain circumstances, providing certain procedures are followed. There are 3 classes of gifts and hospitality. If you are offered a gift or hospitality, the first step is for you to assess which of the three classes the gift/hospitality falls into.

The three categories are:

- ❖ Generally Acceptable
- ❖ Always Ask
- ❖ Never Acceptable

**The key issue to consider is the intention behind the gift/hospitality.**

- Why is it being offered?
- May it reasonably be considered to foster commercial goodwill OR is the expectation or intention for it to act as an inducement to inappropriately curry favour in some way?

| Category             | General Rules   | Examples  |
|----------------------|---|---|
| Generally acceptable | <p>Some gifts and hospitality are small enough not to require approval. The following gifts and hospitality would fall into this category:</p> <p>Gifts or hospitality valued at less than £150, or several gifts with a total combined market value of £500 or less from any one source in any 12 month period (as long as they do not fall into the “Never Acceptable” category, for reasons explained below).</p> <p>Whilst these are considered generally acceptable, it is best practice to let your Line Manager know</p> | <ul style="list-style-type: none"> <li>❖ Occasional meals with a business associate</li> <li>❖ Tickets to ordinary sports, theatre and other cultural events</li> <li>❖ Other reasonable hospitality and customary gifts and entertainment</li> <li>❖ Promotional items of nominal value, such as pens, calendars or computer mats, which are given to customers in general.</li> </ul> |



|                  |  |  |
|------------------|--|--|
|                  | and record the receipt of such a gift or hospitality on the Gifts and Hospitality Register.  |  |
| Always ask       | <p>If something does not fall into the “Generally Acceptable” category, you will need to <b>obtain written approval from your manager before the event.</b></p> <p>For Line Managers:</p> <p>In determining whether to approve something in the “Always Ask” category, managers and, if need be, the Legal Team, should use reasonable judgment and consider issues such as:</p> <ul style="list-style-type: none"> <li>❖ Is it likely to influence objectivity?</li> <li>❖ Whether there is a business purpose (for example, will business be discussed as part of the event in question?)</li> <li>❖ Is the proposed event lavish?</li> <li>❖ What kind of precedent it would set for other employees?</li> <li>❖ Are there any other circumstances that should be considered e.g. Are we about to run a tender for business that the host might be participating in?</li> <li>❖ Does the giver want the event/expenditure to be concealed?</li> </ul> | <ul style="list-style-type: none"> <li>❖ Individual gifts with a market value <b>over</b> £150</li> <li>❖ Gifts and hospitality from a single source with an annual fair market value over £500</li> <li>❖ Special events, such as tickets for a World Cup football match final or the Olympics (these usually have a value of more than £500)</li> <li>❖ Travel or hospitality lasting over a day</li> </ul>  |
| Never acceptable | Other types of gifts and hospitality are simply wrong, and no one can approve these  | <p>Members of staff may never:</p> <ul style="list-style-type: none"> <li>❖ Accept or offer any gift or hospitality that is illegal</li> <li>❖ Accept or offer any gift or “commission payment” of cash or cash equivalent (such as gift certificates, loans, investable securities such as shares, or bank cheques)</li> <li>❖ Accept or request anything as a “quid pro quo” or as part of an agreement to do something in return for the gift or hospitality</li> <li>❖ Participate in any hospitality that is unsavoury or offensive</li> <li>❖ Participate in any activity that you know would cause the person giving the gift or hospitality to violate his or her own employer’s standards</li> <li>❖ Accept or request anything that is not recorded properly on the company’s books</li> </ul> |

## What do I do if I receive a gift that is not permitted?

### You must:

- ❖ Immediately return any gift of cash or cash equivalent; and
- ❖ Inform your Line Manager and the Legal Team and record receipt of the gift in the Gifts and Hospitality register.
  
- ❖ For other types of gifts over the “Generally Acceptable” amount, if your manager determines that the gift should be returned, and returning the gift is impractical, you should hand the gift over to Internal Audit for company use, sale or charitable donation; and
- ❖ A letter should be sent to the donor explaining Premier’s policy with respect to gifts.

## Offering gifts and hospitality

This section of the guidance should be read in conjunction with the “Premier Foods Travel and Business Expenses Policy”. In particular please read the section on “Entertaining Expenses – UK, Europe and International”.

Provided you comply with the following rules, and the Premier Foods Travel and Business Expenses Policy, occasionally offering hospitality to colleagues or exchanging hospitality with business partners is acceptable.

Any gift or hospitality should always comply with the policies of the recipient’s organisation and our own guidelines. If you’re unsure, ask the recipient for a copy of their policies.

### The giving of any gift, promotional item or hospitality must meet all the following requirements:

- ❖ **Must comply with UK law**, and, if applicable, any **national law** if we’re dealing with a third party based abroad, or if you are based abroad.
- ❖ Must be given in the name of Premier and not in the personal name of the employee or representative of Premier.
- ❖ Must **not** include cash or a cash equivalent, including gift certificates.
- ❖ To the extent practicable, should have corporate branding with the Premier Foods logo or the name of a Premier product.
- ❖ Must be customary, in type and value, in the host country and made at an appropriate time or season and in appropriate circumstances. At the same time, the gift or hospitality must still be considered reasonable by the standards of the UK.
- ❖ Must **not** be made with the **intention of influencing a third party** in order to obtain or retain business, or in explicit or implicit exchange for specific favours or benefits from the recipient, in his or her public or private capacity, or from his or her employer.
- ❖ Must be made **openly**, rather than secretly.

- ❖ Must comply with the value limitations and related procedures discussed in this policy.

## Rules for providing gifts and paying for meals

Employees may give gifts that meet all of the above requirements and have a value of less than £150 without prior approval though these gifts must still be recorded on the Gifts and Hospitality Register. Such permissible gifts may include mugs, pens, and other Premier branded promotional items.

Any gifts must be reasonable and justifiable. Any gifts over £150 will require your Line Manager's approval before they are given.

While the £150 limit is intended to be a per-gift amount, consideration must be given to the frequency of providing gifts to any one individual and the relative value of the gift in light of local economic conditions and standards. Employees should avoid giving multiple gifts to the same person (even if they all have a value of less than £150).

In no event shall members of staff give several gifts, in any twelve-month period to the same third party that have a total value of more than £500. No agents or persons acting on behalf of Premier shall provide any gifts or hospitality.

## Record keeping for all gifts and hospitality provided and received

All Premier colleagues (job grades 0 – 3, plus P.A.s to the Executive Leadership Team) must keep records demonstrating the business reason for making payments to third parties.

All gifts and hospitality which must be recorded should be submitted in the spreadsheet which may be found under the Legal Team Shared Policies in "What's Cooking?".

Expenses claims relating to hospitality, gifts or payments to third parties must be submitted and comply with Premier's expenses policy. It must also record the reason for the expenditure.

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

You must declare and keep a written record of all hospitality or gifts given or received, which will be subject to Line Manager review. In the gift and hospitality register should you are required to record:

- ❖ Date of Gift or Hospitality
- ❖ Recipient of Gift or Hospitality
- ❖ Detailed Description
- ❖ Estimated Value in GB£
- ❖ Detailed Description of Gift
- ❖ Name of Line Manager who Provided Approval (if applicable)
- ❖ Other comments to include an explanation of the context the gift or hospitality is given or received including details about any current or future tenders or negotiations involving the parties.

Sample register entries:

| Date of G&H  | Recipient of G&H  | Donor of G&H                 | Description of gift or hospitality  | Estimated value | Approval obtained | Line Manager Approval | Further comments   | Date of Entry |
|--------------|---|------------------------------|---|-----------------|-------------------|-----------------------|--|---------------|
| 29 June 2019 | Joe Bloggs, International business manager, Premier Foods | Food Distribution Limited    | FDL branded canvas bag  | £10             | N/A               |                       |  | 30 June 2019  |
| 14 July 2019 | Jane Bloggs, brand manager, Premier Foods                 | Existing Advertising Limited | Tickets provided to a rep from Existing Advertising Ltd to attend the opera | £275            | Yes .             | Mike Smith            | Tickets provided following the completion of a successful in-store advertising campaign. Jane Bloggs also attended.  | 17 July 2019  |
| 17 July 2019 | Joe Bloggs, International business manager, Premier Foods | Food Distribution Limited    | FDL offered to take Joe Bloggs out for lunch                                | £75             | No                | May Jones             | Approval denied because during tender process. Email sent to FDL that it's not possible to take up offers of hospitality during a tender process. Flagged to internal audit. | 19 July 2019  |

## Guidance Note 2 – Due Diligence

### Factors in considering bribery risk posed by new and existing business relationships

We must take a proportionate and risk based approach for persons who perform, or will perform, services on our behalf to mitigate bribery risks. Conducting due diligence is essential in order for Premier to maintain its reputation, share value, and not be in breach of the law.

#### **When working with a new business partner, we should consider:**

- ❖ whether the use of a business partner is justified;
- ❖ whether the business partner has an adequate anti-corruption policy and has been cleared on our Sanctions and corruption checking platform;
- ❖ whether the business partner has a reputation for corruption (even though it may have no convictions for corruption);
- ❖ whether the business partner is being investigated or prosecuted, or has been convicted or debarred, for corruption. If so, we should ascertain as far as possible the facts of the case;
- ❖ whether the business partner has any relationships with public officials;
- ❖ what due diligence the business partner carries out on its subsidiary and associated companies, subcontractors, suppliers, agents and representatives who are likely to be involved in the project. We should check whether the potential business partner requires its third parties to have anti-corruption policies and procedures in place;
- ❖ whether proposed payments to business partners reflect the market rate for the work proposed; and
- ❖ whether the business partner has requested payments in tax havens (without clear and legitimate reasons for doing so, i.e. the account is not in their name, the country is not the same as the company's registered office or point of supply).

In order to carry out this assessment, we must:

- ask a new business partner to complete a due diligence questionnaire, and
- ensure that a sanctions check is performed.

Where the results indicate that there is a high level of risk, the person who can approve the transaction should be correspondingly high in the organisation, which means that local managers may need to seek the approval of head office.

It is important to remember that we must conduct due diligence on all third party business partners, even if we are only spending or selling a small amount.

## Factors indicating high risk

When conducting due diligence, certain factors should indicate that a third party is 'high risk'. These include:

- ❖ In the past, the party asked a company to prepare false invoices, special fees, expedited services or any other type of false documentation;
- ❖ A refusal by the party to promise in writing to abide by the anti-corruption law, other applicable law, or Premier's policies;
- ❖ Convictions or charges for violation of local or foreign laws or regulations generally, and relating to the award of government contracts;
- ❖ Unexplained or inadequately explained termination by another company;
- ❖ Requests for over-invoicing or that all or a portion of a commission (or other payment) be paid in another country, to a third party, in cash or in otherwise untraceable funds;
- ❖ Requests that monetary transactions be conducted through legal entities or bank accounts located outside the country in which the business partner is either incorporated or expected to conduct activities under its agreement with Premier;
- ❖ A desire to keep the business secret;
- ❖ Heavy reliance on political/government contacts as opposed to knowledgeable staff and investment of time to promote Premier's interests; or
- ❖ A party at the business partner has a family relationship to a government official.

If any of the above high risk factors or other concerns arise during the due diligence process or at any time thereafter, they must be reported to your Line Manager and the Sanctions Compliance Team, who will determine next steps. If appropriate, where there is an ongoing business relationship, your Line Manager, together with the Sanctions Compliance Team, may require Premier to terminate the relationship.

It is Premier's policy to ask all new third parties to complete Premier's Anti-bribery and Corruption Questionnaire provided through the Legal Team. You should ask existing third parties to complete Premier's Anti-bribery and Corruption Questionnaire again every 2 years. Raise any issues or irregularities with your Line Manager and the Legal Team.

## Guidance Note 3 – Due diligence with an international focus

### Additional steps in assessing business partners or when operating outside the UK.

Our international business is growing; be that engaging international business partners or selling in territories outside the UK. While this presents exciting opportunities, it also presents additional challenges in respect of differences in culture and expectations, as well as potential challenges in ensuring business partners are as reputable as they claim.

As with a UK based business partner, a thorough due diligence investigation is required before engagement is justified, and in some circumstances, enhanced checks may be required. This is particularly likely to be the case where the new territory is a risk from a corruption point of view, and where a new business partner operates in a risky territory.

High risk business partners will be those located in a country with considerable risk of corruption, those who have specific interaction with government officials or those for which a high risk has been identified in the due diligence process.

We must:

- ❖ Use the due diligence questionnaire at Guidance Notes 4 to conduct a risk assessment before engaging a new international business partner.
- ❖ Request that the procurement stakeholder conducts a sanctions search, and where a high risk is flagged, ensure that this is passed to the Sanctions Compliance Team to review.

Seek advice from the Legal Team when entering a new territory or proposing to operate in a high risk territory.

## Considerations when dealing with third parties or when operating outside the UK.

**Step 1: Consider the corruption risk of companies operating in a particular country. Review the perceived level of that country's public sector corruption in the latest Transparency International's Corruption Perception Index (CPI) from their website:**

<https://www.transparency.org>

**Premier considers the risk levels for the following CPI scores as follows:**

- **Low Risk: 70 and above;**
- **Medium Risk: 50-69;**
- **High Risk: 49 and lower**

Consider whether the country in which Premier plans to conduct business has:

- ❖ a lack of enforcement of anti-bribery legislation
- ❖ a lack of transparency in business dealings
- ❖ evidence of endemic corruption in everyday life
- ❖ a lack of rule of law and an independent judiciary
- ❖ a lack of independent media
- ❖ a culture that encourages nepotism or cronyism
- ❖ a prevalence of request for facilitation payments

**Step 2: Consider if there is a bribery risk at the transactional level?**

What is the transactional risk?

- ❖ What is the subject matter of the transaction?
- ❖ What is the nature and identity of the parties? Are they connected to the government in some way?
- ❖ The degree of transparency of the transaction or related dealings
- ❖ How critical a particular service is to the procuring party
- ❖ Transactions lacking a clear and legitimate commercial rationale are a high risk.

**Step 3: Consider the impact of local law, custom and practise on the implementation of policies and procedures.**

- ❖ Context is key: consider the circumstances, location, value and beneficiary of the business.
- ❖ If gifts/hospitality are involved, determine whether the gift or entertainment is appropriate.
- ❖ Is it customary in the territory for facilitation payments or commission payments to be made?



**Speak to the Legal Team if you are unsure or if, after having considered the risks, you feel the risk is medium to high. It may be the case that additional checks are required before proceeding.**

**If you have any concerns or require further advice, speak to your Line Manager, your Legal Team, or call Safecall.**

## Guidance Note 4 – Anti- Bribery and Corruption Questionnaire

### Anti- Bribery and Corruption Questionnaire

**Name of third-party business partner:** .....

**Purpose of engagement:** .....

Questions to be completed by third-party representative. Please use a separate piece of paper to respond to the questions, if necessary.

| Part 1 – Structure and Management Information   |                         |
|---|-------------------------|
| 1. Company Name (and any other business or trading name, or prior names in the last 5 years)  |                         |
| 2. Registered Address   |                         |
| 3. Where applicable, please provide:<br>a. Date of Incorporation<br>b. Registered Company Number<br>c. Years in Business<br>d. DUNS number, if known                            | a.<br>b.<br>c.<br>d.    |
| 4. Country of Incorporation   |                         |
| 5. Country goods/services provided from   |                         |
| 6. Name & Registered Address of parent company (or companies)   |                         |
| Part 2 – Ownership Information  |                         |
| 7. Please list all shareholders or owners who hold a financial interest in your business of 25% or more   |                         |
| 8. Name and job title of the Company’s Key Executives (i.e. directors / members of the corporate executive team or management committee and the name of the relationship owner) |                         |
| 9. Month and year of birth of each of the Company Key Executives listed in Section 8 (above).   |                         |
| 10. Is the Company majority-owned by a State entity?  | Please select: Yes / No |
| 11. Are any of the Key Executives (as defined above) public employees or officials?<br>If yes, please provide details.  | Please select: Yes / No |
| Part 3 - Compliance   |                         |

|  |  |
|--|--|
| <p>12. Does your Company have an Anti-Bribery, Gifts &amp; Entertainment, Whistleblowing (Speak Up), or equivalent policies?<br/>         If yes, please supply a copy of the policy.<br/>         If no, please confirm that you agree to comply with our Anti-Bribery and Corruption Policy.</p>   | <p>Please select: Yes / No</p> <p>If yes, please supply a copy of the policy.</p> <p>If no, do you agree to comply with our Anti-Bribery and Corruption Policy?</p> <p>Please select: Yes / No</p> |
| <p>13. In the past 15 years, has your Company (including any subsidiaries and related entities, past and present) or Key Executives in relation to their employment by the Company, been investigated for, or convicted of, any offences, whether civil or criminal?<br/>         This includes, but is not limited to:</p> <ul style="list-style-type: none"> <li>- Bribery</li> <li>- Fraud</li> <li>- Price-fixing or other anti-trust issues</li> <li>- Tax evasion</li> <li>- Breach of Sanctions</li> <li>- Money-laundering</li> <li>- Terrorist Offences</li> </ul> <p>If yes to any of the above, please provide details.</p> |  |
| <p>14. Has your Company been the subject of any security or data breaches or similar incidents in the last 10 years?<br/>         If yes, please provide details.</p>  | <p>Please select: Yes / No</p>   |

Certification

I hereby certify that the answers to the foregoing questions are accurate and complete to the best of my knowledge.

\_\_\_\_\_  
 SIGNED BY AN AUTHORISED SIGNATORY

\_\_\_\_\_  
 PRINT NAME AND TITLE

\_\_\_\_\_  
 DATE