

Freshways Group Anti- Bribery and Corruption Policy

1. Definition

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means in the course of business giving or receiving money, gifts, meals, entertainment or anything else of value as an inducement to a person to do something which is dishonest or illegal.

Any form of corruption is unethical and unacceptable, and bribery is a criminal offence under the UK Bribery Act 2010. The Freshways Group (“**Freshways**”) prohibits any form of bribery or corrupt behaviour. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by Freshways employees or by third parties acting for or on behalf of Freshways.

2. Purpose

The purpose of this policy is to convey to all employees and interested parties of Freshways, the rules in relation to our unequivocal stance towards the eradication of bribery and corruption and our commitment to ensuring that Freshways conducts its business in a fair, professional and legal manner.

3. Offences

Under UK law, is a criminal offence to:

- offer a bribe
- accept a bribe
- bribe a foreign official
- as a commercial organisation, to fail to prevent a bribe.

You should be aware that if you are found guilty by a court of committing bribery, you could face up to 10 years in prison and/or an unlimited fine. Freshways could also face prosecution and be liable to pay a fine.

4. Scope

This policy applies to all employees of Freshways, regardless of seniority or site. It also extends to anyone working for or on our behalf eg those engaged by us on a self-employed basis or an agency arrangement, or our suppliers or contractors, whether in the UK or any other country. This policy is communicated to all staff and training is provided to appropriate levels of management and any employees subject to a perceived higher level of risk.

5. Policy

It is prohibited for any employee of Freshways, or third party, contractor or supplier connected to our business to engage in or permit or engage a third party to engage in any illegal, unethical, or

dishonest behaviour, whether or not for personal gain or that of Freshways or another organisation.

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or organisation in order to gain commercial, contractual or regulatory advantage for Freshways or any other organisation, or in order to gain or facilitate any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner in order to influence an individual in their capacity as a public official. You should not make a payment to a third party on behalf of a public official. You should also not make or in any way be involved in any 'Facilitation Payment' to induce a public official to induce such a person to perform a routine function they are otherwise obligated to inform.

If you witness corrupt behaviour, or are offered a bribe or a bribe is solicited from you, you should not condone or agree to it unless your immediate safety is in jeopardy. You should immediately contact a member of senior management so that action can be taken if considered necessary. You may be asked to give a written account of events.

If you, as an employee or person working on our behalf, suspect that an act or attempted act of corruption or bribery, has taken place, even if you are not personally involved, you are expected to report this to a member of senior management. You may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.

Freshways will ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

Freshways takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

We will uphold laws relating to corruption and bribery and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in your dismissal if you are an employee, or the cessation of our arrangement with you if you are self-employed, an agency worker, contractor etc.

Staff are reminded of Freshways' whistleblowing policy which is available in the employee handbook, or upon request.

6. Gifts and hospitality

We realise that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly



recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Gifts include money; goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context); services or loans given or received as a mark of friendship or appreciation.

Hospitality includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

No gift nor hospitality should be given, offered or accepted by an employee or anyone working on our behalf of any party in connection with our business where the gift or hospitality is lavish, excessive or might be interpreted as a bribe or pay off.

No gift nor hospitality should be given, offered or accepted by an employee or anyone working on our behalf to any party in connection with our business greater than £100 in value or, £300 in aggregate over any 12 month period without receiving prior written approval from a function head of Freshways.

A record will be made of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and we reserve the right to amend this policy without prior notice.

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