

Anti-bribery Policy

1. Purpose

- 1.1 East Riding Sacks Limited is committed to the practice of responsible corporate behaviour and to complying with all laws, regulations and other requirements which govern the conduct of our operations.
- 1.2 The Company is fully committed to instilling a strong anti-corruption culture and is fully committed to compliance with all anti-bribery and anti-corruption legislation including, but not limited to, the Bribery Act 2010 ("the Act") and ensures that no bribes or other corrupt payments, inducements or similar are made, offered, sought or obtained by us or anyone working on our behalf.

2. Bribery

- 2.1 Bribery is defined as the giving or promising of a financial or other advantage to another party where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage is improper conduct, illegal, unethical, a breach of trust or improper in any way.
- 2.2 Bribery is also deemed to take place if any party requests or agrees to receive a financial or other advantage from another party where that advantage is intended to induce that party to perform a particular function improperly, where the acceptance of that advantage is improper conduct, or where that party acts improperly in anticipation of such advantage.
- 2.3 Bribery can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit. Bribery includes offering, promising, giving, accepting or seeking a bribe.
- 2.4 All forms of bribery are strictly prohibited. If you are unsure whether a particular act constitutes bribery, please contact a director.

3. Consequences of Bribery

- 3.1 Anyone or any organisation found guilty of bribery under the Act may face fines and/or prison terms. In addition, high legal costs and adverse publicity are likely to result from any breach of the Act.
- 3.2 For employees of the Company, failure to comply with this Policy and/or with the Act may result in:

- 3.2.1 disciplinary action which may include dismissal for gross misconduct; and
- 3.2.2 criminal penalties under the Act which may result in a fine and/or imprisonment for up to 10 years.

3.3 For the Company, any breach of this Policy by any employee or business associate may result in:

- 3.3.1 the Company being deemed to be in breach of the Act;
- 3.3.2 the Company being subject to fines; and
- 3.3.3 the Company suffering negative publicity and further associated damage because of such breach.

4. Responsibility for Compliance and Scope of Policy

- 4.1 This Policy applies to all employees, agents, contractors, subcontractors, consultants, business partners and any other parties (including individuals, partnerships and bodies corporate) associated with the Company or any of its subsidiaries.
- 4.2 It is the responsibility of all the abovementioned parties to ensure that bribery is prevented, detected and reported and all such reports should be made in accordance with the Company's Whistleblowing Policy or as otherwise stated in this Policy, as appropriate.
- 4.3 No party described in section 4.1 may:
 - 4.3.1 give or promise any financial or other advantage to another party (or use a third party to do the same) on the Company's behalf where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage will constitute improper conduct;
 - 4.3.2 request or agree to receive any financial or other advantage from another party where that advantage is intended to induce the improper performance of a particular function, where the acceptance of that advantage will constitute improper conduct, or where the recipient intends to act improperly in anticipation of such an advantage.
- 4.4 You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or

corruption.

4.5 Parties described in section 4.1 must:

- 4.5.1** be aware and alert at all times of all bribery risks as described in this Policy.
- 4.5.2** always exercise due diligence when dealing with third parties on behalf of the Company; and
- 4.5.3** report all concerns relating to bribery to your line manager or, in the case of non-employees, their normal point of contact within the Company, or otherwise in accordance with the Company's Whistleblowing Policy.

5. Record keeping

- 5.1** You must declare and keep a written record of all hospitality or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.
- 5.2** 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.

6. How to raise a concern

- 6.1** If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your manager or a director as soon as possible.

7. Facilitation and "Kickback" Payments

- 7.1** A facilitation payment is defined as a small payment made to officials to ensure or speed up the performance of routine or necessary functions.
- 7.2** Facilitation payments constitute bribes and, subject to section 7.3, may not be made at any time irrespective of prevailing business customs in certain territories.

8. Gifts and Hospitality

- 8.1** Gifts and hospitality remain a legitimate part of conducting business and should be provided only in a manner that is reasonable, proportionate, and transparent. This policy does not prohibit giving or receiving promotional gifts of low value

and normal, appropriate hospitality.

8.2 Gifts and hospitality can, when excessive, constitute a bribe and/or a conflict of interest. Care and due diligence should be always exercised when giving or receiving any form of gift or hospitality on behalf of the Company.

8.3 The following general principles apply:

8.3.1 Gifts and hospitality may neither be given nor received as rewards, inducements or encouragement for preferential treatment or inappropriate or dishonest conduct.

8.3.2 Neither gifts nor hospitality should be actively sought or encouraged from any party, nor should the impression be given that the award of any business, custom, contract or similar will be in any way conditional on gifts or hospitality.

8.3.3 Cash should be neither given nor received as a gift under any circumstances.

8.3.4 Gifts and hospitality to or from relevant parties should be generally avoided at the time of contracts being tendered or awarded.

8.3.5 The value of all gifts and hospitality, whether given or received, should be proportionate to the matter to which they relate and should not be unusually high or generous when compared to prevailing practices in our industry or sector.

8.3.6 Certain gifts which would otherwise be in breach of this Policy may be accepted if refusal would cause significant and/or cultural offence, however the Company will donate any gifts accepted for such reasons to a charity of the directors choosing.

8.3.7 All gifts and hospitality, whether given or received, must be recorded.

9. Charitable Donations

9.1 Charitable donations are permitted only to registered (non-profit) charities. No charitable donations may be given to any organisation which is not a registered charity.

9.2 Proof of receipt of all charitable donations must be obtained from the recipient organisation.

- 9.3 Under no circumstances may charitable donations be made in cash.
- 9.4 No charitable donation may be made at the request of any party where that donation may result in improper conduct.

10. Political Donations

- 10.1 The Company does not make political donations, and the Company is not affiliated with any political party, independent candidate, or with any other organisation whose activities are primarily political.
- 10.2 Employees and other associated parties are free to make personal donations provided such payments are not purported to be made on behalf of the Company and are not made to obtain any form of advantage in any business transaction.

For and on behalf of the Board of Directors, East Riding Sacks Limited.