



## BRIBERY PREVENTION POLICY

In accordance with the Bribery Act 2010, bribery is defined as giving someone a financial or other advantage to induce them to perform their functions or activities improperly, or to reward them for having already done so. In addition, there is an offence relating to failure by a business to prevent a person associated with it from committing the above offences on its behalf in order to win business, keep business or gain a business advantage for the organisation.

Grey Simmonds Food Service Equipment Ltd does not engage in bribery or any form of unethical inducement or payment including facilitation payments and 'kickbacks.' All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the Company. Employees must declare and keep a record of hospitality or gifts accepted or offered, which will be subject to Board level review. Employees will receive the full support of the Group when refusing to pay a bribe, even if it may result in the Company losing business.

### **Grey Simmonds Food Service Equipment Ltd prohibits;**

- the offering, giving, solicitation or acceptance of any bribe, whether cash or other inducement **to or from**

- any person or company, wherever they are situated and whether they are a public official or body or private person or company

**by**

- any individual employee, agent or other person or body acting on the Company's behalf

**in order to**

- gain any commercial, contractual or regulatory advantage for the Company, in a way which is unethical

**or in order to**

- gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual

Food Service Equipment



This includes a prohibition of the payment of donations to political parties or charities that are directly linked to obtaining new business or gaining a business advantage.

Behaviour and procedures to be followed during business transactions must always be conducted in a manner conducive to the aims and intents of this policy. Where employees suspect they might be put under pressure to offer or accept inducements, a commercial practice risk assessment must be carried out and suitable and sufficient control measures put in place to support the employee, clarify the Company's position and policy to the other party, or avoid the situation altogether.

This policy is not meant to prohibit the following customary practices as long as they are proportionate and reasonable given the sort of business we do, and are properly recorded:

- normal and appropriate hospitality including reasonable expenses in attending hospitality events
- the giving of a ceremonial gift on a festival or at another special time
- the use of any recognised fast-track process which is available to all on payment of a fee
- the offer of resources to assist a person or body to make a decision more efficiently, provided that they are supplied for that purpose only
- donations made in good faith, but these must be publicly disclosed.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery or facilitation payment, the matter must be referred to the Board of Directors who have responsibility for maintaining this policy before proceeding.

### **Employee Responsibility**

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the Company. Suitable channels of communication by which employees or others can report confidentially any suspicion or concern regarding bribery will always be strictly maintained by the Board of Directors, and employees should report to them directly with any concerns or "whistle-blowing" case reporting.

The policy will be kept up to date, to ensure this, the policy and the way in which it has operated will be reviewed at least once a year, or when there are operational or other considerations demonstrating the need for immediate review and particularly as and when new legislation is introduced.



**Signed:**  
**Scott Dackombe**  
**Managing Director**

Food Service Equipment



**DATE: 1<sup>st</sup> January 2025**

**LATEST DATE FOR NEXT REVIEW: 31<sup>st</sup> December 2025**