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## Anti-Bribery and Corruption Policy

It is the aim of Nationwide Hygiene Supplies Ltd to distribute to our customers the best, most reliable and honest customer service we can provide. To achieve this vision we have to build, maintain, protect and enhance our reputation among our customers, distributors, employees and suppliers, as well as among the community at large, whether in the UK or overseas.

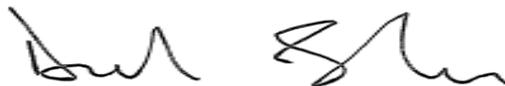
A good reputation for service is a hard won asset which we must protect. Our ability to tender for new business and our relationship with the full range suppliers depends a great deal upon the good reputation that we have established. This means all of us acting to the highest personal, ethical and corporate standards in everything we do. It means making sure all our actions and decisions support the Nationwide's vision and values.

This policy is designed to underline not just the legislation relevant to bribery and corruption but also to provide details of further help and training which may be needed. We encourage all staff to seek further guidance or assistance if they feel it is needed in any way. Each employee is tasked with making a personal contribution to protecting and enhancing the company's reputation by complying with this policy.

It is only by each one of us individually being aware of the law and complying with it that we can be sure we protect and enhance the reputation of Nationwide Hygiene Supplies Ltd.

I am committed to this policy and would ask you to show your commitment too by reading it and, if you have any queries or concerns at all to raise them with me as set out at the end of the policy.

Kind regards

A handwritten signature in black ink, appearing to read "David Scholes".

David Scholes  
Chief Executive

## **Introduction**

In the UK and in many of the jurisdictions in which we operate, it is a criminal offence to offer, promise or provide – or request or accept - a bribe. In the UK it is also an offence for a commercial organisation to fail to prevent an incident of bribery committed either by the company or by someone associated with it in order to obtain or retain a business advantage.

This means that bribery and corruption have absolutely no place at Nationwide Hygiene Supplies Ltd – and why we operate a strict no tolerance policy towards bribery in all its forms whether directly or through third parties.

This anti-bribery and corruption policy applies to all members of Nationwide Hygiene Supplies Ltd – full and part-time employees and temporary staff wherever we are based. It also applies to business partners who supply services to Nationwide Hygiene Supplies Ltd including agents and intermediaries.

When we have to rely on the services of contractors, sub-contractors and consultants we want to do business only with those who accept the terms of our policy or whose own policy sets standards to match our own.

This policy sets out our anti-bribery and corruption rules and explains what is expected of you – but we ask you to do more than follow rules. We want you to act according to the spirit and the values they represent through whatever you do for Nationwide Hygiene Supplies Ltd. In this way we can achieve our vision together and help drive up standards throughout the industry.

## **Understanding and recognising bribery and corruption**

Bribery and corruption can occur in many forms; so understanding them and recognising when they might occur is a key step in guarding against them.

Bribery is when a person offers, promises or gives a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act improperly.

Corruption is any form of illegal, dishonest or bad behaviour, especially by people in positions of power.

In our industry, bribery could occur in situations such as tendering, appointing preferred suppliers, contractors and agents, awarding licences and so on.

Bribery and corruption can be found at all levels from governments and government officials through to site operatives. Wherever we work in the world – even where bribery may be seen as the norm – we must be clear that we will not participate in or condone any form of bribery in our dealings with the public or private sectors.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a business decision.

Transparency and openness are effective weapons against bribery, so be ready to challenge any arrangements that compromise them.

Even political contributions, charitable donations and sponsorship arrangements can be used as a subterfuge for bribery.

### **Penalties for engaging in bribery and corruption**

As befits a serious criminal offence, the penalties for engaging in bribery or corruption are severe. Individuals and companies can face punitive fines and even imprisonment.

In the UK, new legislation incorporates a specific criminal offence of a company failing to prevent bribery committed on its behalf. We take this responsibility very seriously and this is why we want to be associated only with others whose standards match our own.

A conviction for a bribery or corruption related offence would have severe penalties for our reputation. A damaged reputation could lead to us being excluded from tender lists or overlooked when bidding and loss of business; all of which could have severe financial consequences for our business.

### **Preventing Bribery**

Our 'no tolerance' of bribery relies on each one of us choosing to always do the right thing. All this takes is a few simple commitments:

#### **We will always:**

- Comply with this Anti-Bribery and Corruption Policy
- Act according to the Nationwide Hygiene Supplies Ltd Values
- Be guided by our vision and values of openness and honesty
- Comply with company policies on gifts and hospitality; political contributions and charitable donations
- Comply with our requirements concerning any conflicts of interest
- Record all activities and transactions accurately, completely and transparently
- Follow appropriate due diligence and risk mitigation procedures before proceeding with any contract or other arrangement
- Seek advice if unsure how to proceed
- Report any suspected or actual breaches of this policy promptly and accurately to your line manager or via the Get in Touch Helpline
- Be alert to 'red flags' and immediately report or seek guidance about them.

## **We will never:**

- Participate in any form of corrupt behaviour
- Use company funds, in the form of payments or gifts and hospitality for any unlawful, unethical or improper purpose
- Authorise, make, tolerate or encourage, or invite or accept, any improper payments to obtain, retain or improve business
- Permit anyone to offer or pay bribes or make facilitation payments on our behalf, or do anything else we would not be permitted to do ourselves
- Offer or give anything of value to a public official (or their representative) to induce or reward them for acting improperly in the course of their public responsibilities
- Offer or accept gifts or hospitality, if we think this might impair objective judgement, improperly influence a decision or create a sense of obligation, or if there's a risk it could be misconstrued or misinterpreted by others.

## **How to raise a concern**

If you have a concern or know of or suspect a violation of this policy we want you to speak up immediately. Please don't ignore it. Speaking up can be a difficult thing to do, so be reassured that all information received will be treated seriously and investigated appropriately.

If you act in good faith, believing your information is accurate, we will protect you even if you are wrong. Doing the right thing will not disadvantage your career or adversely affect your relationships at work. And that is why we will not tolerate any form of discrimination or bullying of someone who has spoken up in good faith. Some concerns can be addressed by speaking to the person whose conduct is a cause for concern.

We understand that this is not always possible so we suggest that you speak to your supervisor or line manager. We will treat your information in confidence and if you prefer, and the law allows it, you can report anonymously.

## **Disciplinary action**

Bribery is a criminal offence which can lead to criminal penalties. But in addition, you have a duty to Nationwide Hygiene Supplies Ltd and breaches of this policy will result in prompt disciplinary action, up to and including dismissal.

## **Statement of commitment**

We will not tolerate any form of bribery or corruption. This policy demonstrates the Nationwide Hygiene Supplies Ltd Board of Directors "no-tolerance" approach to bribery and corruption. It will be regularly reviewed and updated if necessary as new threats

appear. This policy applies to the whole of the Nationwide Hygiene Supplies Ltd and as such should be seen as setting the broad rules and guidance for all.

## **Legislation**

The Bribery Act reforms the criminal law to provide a new, modern and comprehensive scheme of bribery offences that will enable courts and prosecutors to respond more effectively to bribery at home or abroad.

Specifically it creates:

- Two general offences covering the offering, promising or giving of an advantage and requesting, agreeing to receive or accepting of an advantage
- A discrete offence of bribery of a foreign public official
- A new offence of failure by a commercial organisation to prevent a bribe being paid for or on its behalf (it will be a defence if the organisation has adequate procedures in place to prevent bribery).

You can find out more via <http://www.justice.gov.uk/publications/bribery-act.htm>

*Updated, June 2013*