

## Introduction and Objectives

In the UK and in many of the jurisdictions in which Nationwide Hygiene Group operates, 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 organisation 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 Group and why the organisation operates a strict “zero-tolerance” policy towards bribery in all its forms whether directly or through third parties.

This policy sets out the Nationwide Hygiene Group’s anti-bribery and corruption rules and explains what is expected as a minimum of all employees. In addition, Nationwide Hygiene Group wants all employees to act according to the spirit and the values that they represent through whatever they do for Nationwide Hygiene Group. In this way the organisation can achieve its vision and help drive up standards throughout the industry.

## Scope of Application

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

When the Group has to rely on the services of contractors, sub-contractors and consultants it wants to do business only with those who accept the terms of this policy or whose own policy sets standards to match.

The Group will take account of this policy throughout the organisation including within:

- Policies & procedures
- Administration of the supply of products from suppliers
- Distribution of hygiene products
- Management of the Group’s Chesterfield facilities

## Related Policies

Corporate Social Responsibility Policy

Code of Conduct

Supply Chain Policy

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The Company reserves the right to amend, change or withdraw any part of this document at any time.

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## Policy Guidelines

### Statement of Commitment

The Group will not tolerate any form of bribery or corruption. This policy demonstrates the Group's Board of Directors' "zero-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 Group and as such should be seen as setting the broad rules and guidance for all.

### 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 this (and any) industry, bribery could occur in situations such as tendering, appointing preferred suppliers, contractors and agents, awarding licences and other sales situations.

Bribery and corruption can be found at all levels from governments and government officials through to site operatives. Wherever the Group operates in the world – even where bribery may be seen as the norm – it must be clear that the Group will not participate in or condone any form of bribery in any 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.

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In the UK, new legislation incorporates a specific criminal offence of a company failing to prevent bribery committed on its behalf. The Group takes this responsibility very seriously and this is why it wants to be associated only with others whose standards match its own.

A conviction for a bribery or corruption related offence would have severe penalties for the Group's reputation.

A damaged reputation could lead to the Group being excluded from tender lists or overlooked when bidding, and loss of business; all of which could have severe financial consequences for the Group's business.

### **Preventing Bribery**

The Group's zero-tolerance of bribery relies on each employee choosing to always do the right thing. All this takes is a few simple commitments:

Nationwide Hygiene Group staff will always:

- Comply with this Anti-Bribery and Corruption Policy
- Act according to the Nationwide Hygiene Group Values
- Be guided by the Group's vision and values of openness and honesty
- Comply with company policies on gifts and hospitality, political contributions and charitable donations
- Comply with the 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 line management or via the "Get in Touch" Helpline
- Be alert to 'red flags' and immediately report or seek guidance about them

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Nationwide Hygiene Group will never:

- Participate in any form of corrupt behaviour
- Use company funds, in the form of payments or gifts or 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 the Group's behalf, or do anything else that would not be permitted by the Group
- 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 it is thought that this might impair objective judgement, improperly influence a decision or create a sense of obligation, or if there's a risk that it could be misconstrued or misinterpreted by others

#### **How to Raise a Concern**

Any employee (at any level) who has a concern or is aware of or suspects a violation of this policy is requested to speak up immediately. Please do not ignore it. Speaking up can be a difficult thing to do, and all employees should be reassured that all information received will be treated seriously and investigated appropriately.

If employees act in good faith, believing information to be accurate, the Group will protect them even if they are wrong. Doing the right thing will not disadvantage an employee's career or adversely affect any relationships at work. This is why the Group 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. The Group understands that this is not always possible so it suggests that in this instance, a supervisor or line manager could be the point of contact. All information will be treated in confidence and if preferred (and the law allows it) it can be reported anonymously.

#### **Disciplinary Action**

Bribery is a criminal offence which can lead to criminal penalties. In addition, employees have a duty to the Group and breaches of this policy will result in prompt disciplinary action, up to and including dismissal.

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## 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)

To find out more about the bribery act visit <http://www.justice.gov.uk/publications/bribery-act.htm>

## Ownership, Approval Process, Changes and Deviations

This Policy was approved by the Board of Directors of Nationwide Hygiene Group and is reviewed annually. The policy is owned by the Chief Executive, and all updates, changes, deviations and supplements will be authorised by this role.



**Darren Broad**

Chief Executive Officer

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