



## Anti-Bribery Including Gifts & Hospitality Policy

Reviewed by Mark Mulberry  
Date updated 20/12/2017  
Date of Next review 20/12/2022

### Purpose of the Policy

The purpose of this policy is to provide clear guidance in respect of what constitutes bribery and guidance for giving and receiving gifts and hospitality.

### Scope of the Policy

The Mulberry & Co Anti-Bribery policy is mandatory for all Mulberry & Co employees, agents, intermediaries, consultants, distributors, sub-contractors and suppliers (Business Partners) working on behalf of Mulberry & Co anywhere in the world.

### Policy Statement

At Mulberry & Co we are committed to doing the right thing, the right way. We operate a zero tolerance approach to the making or receiving of bribes or corrupt payments, in any form. This type of conduct is absolutely prohibited, whether committed by employees or anyone else acting on behalf of the business. Mulberry & Co is fully committed to complying with its obligations under applicable legislation, including the Bribery Act 2010 (the "Act"), and ensuring that no bribes or corrupt payments are made, offered, sought or obtained by anyone acting on its behalf, to anyone. A copy of the legislation can be found here

<https://www.legislation.gov.uk/ukpga/2010/23/contents>

This policy sets out what we must all do to help prevent bribery in all its forms. A bribe may include any payment, benefit or gift offered or given with the purpose of influencing a decision or outcome. The bribe may not always be of a large value. It could be a lunch or an invitation to a sporting event.

### General Points

Any act of bribery, in whatever form is unacceptable. We will consider taking disciplinary action against anyone who fails to comply with the anti-bribery policy up to and including dismissal. Failure to comply with this policy may also leave you open to a criminal prosecution under the Act. An offence under the Act can result in a fine and/or up to a maximum of 10 years' imprisonment.

A breach of this Policy by an employee or business partner could result in the Business breaching the Act. An offence under the Act can result in the business being fined and would likely lead to negative publicity and serious damage to the reputation of Mulberry & Co.

The following conduct is absolutely prohibited under this Policy:

- Making unofficial payments to officials in order to obtain any permission or permit;
- Appointing any third party or supplier to act on behalf of Mulberry & Co who you know or have good reason to believe to have engaged in any corrupt or unlawful conduct including any offences under the Act; or
- Paying any third party for the purposes of being a 'fixer' to open doors.
- Facilitation payments ('facilitating', 'speed', 'back-hander' or 'grease' payments) are any payments, usually small cash payments made to low-level officials, as a bribe to secure or expedite the performance of a routine or necessary action or level of service.

You must maintain a high standard of professionalism and not open yourself up to suspicion of dishonesty or put yourself in a position of conflict between your work and your private interests. Gifts and entertainment given and received as a reward, inducement or encouragement for preferential treatment or inappropriate or dishonest conduct are strictly prohibited.

It is important that all Mulberry & Co employees' actions are able to withstand scrutiny, and not cause any embarrassment to the Business, yourself or any third party, including contractors or suppliers.

Mulberry & Co does not make contributions or donations to political organisations or independent candidates, nor does it incur any political expenditure.

We respect the right of individual employees to make personal contributions, provided they are not made in any way to obtain advantage in a business transaction.

Mulberry & Co aims to conduct business with the highest standards of ethics, honesty and integrity, and recognises that you have an important role to play in maintaining this aim. Any employee concerned about any form of malpractice, improper action, or wrongdoing by the Business, its employees or other stakeholders are strongly encouraged to report the matter to Nicky Mulberry.

We believe it is essential to create an environment in which you feel able to raise any matters of genuine concern internally without fear of disciplinary action being taken against you, that you will be taken seriously, and that the matters will be investigated appropriately and as far as practicable be kept confidential.

Mulberry & Co believes that any employee with knowledge of bribery in any form should not remain silent. We take all matters of malpractice, improper action or wrongdoing very seriously and you are strongly encouraged to raise incidents or behaviours that are not in accordance with the policy.

### **Gifts and hospitality**

All Mulberry & Co employees are expected to conduct themselves with integrity, impartiality and honesty at all times. Accordingly, all employees are required to follow these rules on Gifts, Hospitality and Entertainment.

No gifts, hospitality or entertainment may be given or accepted during a tender process or during contractual negotiations if there is any realistic risk that such gifts or entertainment could influence the outcome of such processes or negotiations.

We realise that the giving and receiving of gifts and hospitality as a reflection of friendship or appreciation where nothing is expected in return may occur, or even be commonplace, in our industry. This does not constitute bribery where it is proportionate and recorded properly.

- No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business above £100 without receiving prior written approval from Nicky Mulberry.
- Similarly, no gift or offer of hospitality of a value greater than £100 should be accepted by an employee or anyone working on our behalf without receiving prior written approval from Nicky Mulberry. In all cases full details of gifts and hospitality received should be notified to Nicky Mulberry.
- A record will be made of every instance in which gifts or hospitality are given or received in excess of this £100 threshold

You may accept low value token gifts such as branded pens, stationery and mouse mats produced for the purpose of being given away, if given by an existing supplier.

Mulberry & Co employees may occasionally receive invitations from suppliers or others to corporate hospitality or entertainment events.

Hospitality or entertainment may only be accepted if:

- Employees or personnel from the supplier are in attendance;
- The entertainment and/or acceptance of it could not be interpreted as a reward, inducement or encouragement for a favour or preferential treatment; and It is not unduly lavish or extravagant.

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