

ABC, Gifts and Hospitality

Introduction

GEZE UK is dedicated to ensuring full compliance with relevant laws and legislation on Anti-Bribery and Corruption, (“ABC”) by all its employees. Compliance with the Company’s Policy in relation to Bribery and Corruption is regarded as part of your contract of employment.

Bribery: is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, in the conduct of the Company’s business.

Corruption: is the abuse of entrusted power for a private gain.

The UK anti-bribery and corruption legislation applies to all activities of a UK-based business no matter where they are carried out in the world. This policy therefore applies to ALL activities worldwide. It does not matter whether the bribe is:

- given or received directly or through a third party (such as someone acting on GEZE UK’s behalf for example an agent, distributor, supplier, joint venture partner or other intermediary); or
- for the benefit of the recipient or some other person.

Bribes can take many forms, for example:

- money (or cash equivalent such as shares);
- unreasonable gifts, entertainment or hospitality;
- unwarranted rebates or excessive commissions (e.g. to marketing agents);
- unwarranted allowances or expenses;
- payments made to fast route an operation (where that route is not on opening available to all);
- certain political/charitable contributions;
- uncompensated use of company services or facilities; or
- anything else of value.

How do I know if something is a bribe?

In most circumstances, common sense will determine when a bribe is being offered. E.g.

- excessive commission, a lavish gift, a kickback or making a contribution to a charity or political organisation?
- a payment for services to someone other than the service provider?
- Unreasonable hospitality or gifts

Policies and Procedures

General prohibition

GEZE UK has a zero tolerance policy towards Bribery and Corruption and as such, all forms of bribery and corruption are prohibited when dealing with any person whether they are in the public or private sector and the provisions of this policy are of general application. Many countries have specific controls regarding dealing with public officials and these should be followed within those countries.

ABC, Gifts and Hospitality

Gifts and hospitality

Giving or receiving gifts or hospitality is often an important part of maintaining and developing business relationships. All gifts and hospitality should be for a genuine purpose, reasonable and given in the ordinary course of business. Guidance:

- All gifts and hospitality given and/or received are to be logged in a Gifts & Hospitality Register which is located with HR.

Facilitation Payments

Facilitation Payments are illegal and are prohibited under this policy, as is anything which might be interpreted as a facilitation payment unless expressly permitted under written local legislation. In the event that you consider the risk of Facilitation Payments being required to complete a project, or have been requested to initiate a Facilitation Payment, inform your Line Manager immediately. The Line Manager will instruct you on how to manage the situation.

Agents, Distributors, Suppliers and Joint Venture Partners

GEZE UK is committed to promoting compliance with effective anti-bribery and corruption policies by all third parties acting on our behalf. All arrangements with third parties should be subject to clear contractual terms, including specific provisions requiring them to comply with minimum standards and procedures in relation to bribery and corruption.

Dealing with Public Officials

Although this policy applies to both public and private sectors, dealing with public officials poses a particularly high risk in relation to bribery. public officials include those in government departments, employees of government commercial enterprises, international organisations, political parties and political candidates. Many public officials have their own rules regarding the acceptance of gifts and hospitality etc. and we must respect these rules where applicable.

Further clarification:

GEZE UK recognises that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded including normal and appropriate hospitality, 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.

Compliance with this policy

The reporting chain is as such:

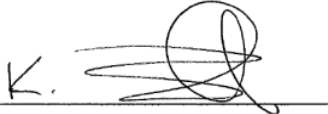
Employee → **Line Manager** → **Director** → **Managing Director**

The day-to-day management of health, safety, quality and environment is delegated to all line managers who are expected to achieve the aims of the company policies and procedures.

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The implementation of the company policies and procedures is the responsibility of the Managing Director, assisted by the UK HSQE Manager and other members of the UK Management Team.

These policies and procedures shall be reviewed annually at the management meetings and re-issued every 12months.



K. Spiewakowski
Managing Director