



## Northshire Kitchens Anti-Bribery Policy

### 1. Purpose

Northshire Kitchens is committed to conducting business with integrity, transparency, and compliance with all applicable laws, including the UK Bribery Act 2010. This policy aims to ensure that all employees, contractors, and business partners understand and adhere to anti-bribery laws and ethical business practices.

### 2. Scope

This policy applies to:

- All employees, officers, and directors of Northshire Kitchens.
- Any contractors, consultants, agents, and third parties acting on behalf of Northshire Kitchens.

### 3. What is Bribery?

Bribery involves offering, promising, giving, requesting, or accepting something of value to influence a decision unfairly. It includes:

- Offering or accepting money, gifts, hospitality, or favours to secure business advantages.
- Making facilitation payments (unofficial payments to speed up a routine process).
- Failing to prevent bribery within the company.

### 4. Company Responsibilities

Northshire Kitchens strictly prohibits:

- Offering, giving, soliciting, or receiving bribes.
- Making facilitation payments, even if they are common practice in some countries.
- Engaging in activities that could be perceived as bribery.

The company will:

- Implement training and awareness programs on anti-bribery policies.
- Monitor and audit compliance with this policy.
- Take disciplinary action, including dismissal, for violations.

### 5. Employee Responsibilities

All employees must:

- Refuse any bribes and report any suspected bribery incidents.
- Ensure that any gifts or hospitality are reasonable and transparent.
- Conduct due diligence on third parties acting on behalf of Northshire Kitchens.
- Report any concerns regarding potential bribery to their manager or the designated compliance officer.

### 6. Gifts & Hospitality

- Modest gifts and hospitality may be acceptable if they are reasonable, transparent, and not intended to influence a business decision.
- Lavish or frequent gifts and entertainment should be avoided.
- Any gifts or hospitality exceeding £50 must be reported and recorded.

## **7. Dealing with Third Parties**

- All suppliers, agents, and contractors must comply with this policy.
- Contracts must include anti-bribery clauses.
- Due diligence must be performed before engaging with new business partners.

## **8. Reporting Bribery Concerns**

Employees and business partners should report suspected bribery to their manager or the designated compliance officer. Reports can be made anonymously if necessary. Northshire Kitchens will protect whistleblowers from retaliation.

## **9. Consequences of Non-Compliance**

Failure to comply with this policy may result in:

- Disciplinary action, including termination of employment.
- Legal consequences, including fines and imprisonment.
- Reputational damage to the company.

## **10. Policy Review**

This policy will be reviewed annually to ensure compliance with legal requirements and best practices.

**Date:** [Insert Date]

**Approved by:** [Insert Name]

**Position:** [Insert Position]