

Anti-Bribery Policy (T&C)

1 Statement of Policy

- 1.1 Nobisco Limited (the Company) is committed to implementing and enforcing effective systems to counteract bribery and to conduct all aspects of its business in an honest and ethical manner at all times.
- 1.2 The Company will act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the Company's 'zero-tolerance' to bribery. Under UK law, bribery and corruption is punishable for individuals by up to ten years imprisonment. If the Company is found to have taken part in the corruption or lacks adequate procedures to prevent bribery, it could face an unlimited fine and be excluded from tendering for Government contracts.

2 About this Policy

- 2.1 This policy applies to all works, employees (which may include consultants, contractors and agency workers) and also to third parties such as customers, suppliers or visitors to our premises.
- 2.2 This policy forms part of any employee's contract of employment.
- 2.3 Nobisco Limited will investigate any allegations of bribery or fraud through the disciplinary process as potential gross misconduct.
- 2.4 Nobisco Limited will inform and involve appropriate authorities in an investigation and or its findings. The Company will fully cooperate with the authorities to instigate formal legal proceedings that may lead to criminal charges of corruption.

3 Gaining commercial advantage

- 3.1 The company will not:
 - Make contributions of any kind with the purpose of gaining any commercial advantage.
 - Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
 - Accept any gifts or hospitality with the intention of acting improperly and seeking to influence a commercial decision.

4 Gifts and hospitality

4.1 From time-to-time directors, workers and employees may be offered gifts of thanks or gifts related to Christmas. The Company set the following rules in place:

4.1.1 Receiving business gifts: receiving promotional gifts of low value is normal and appropriate, however, gifts with a value exceeding £25.00 may not be accepted without approval. Any gift offered and then refused because of its value, must be reported to The Company. 'Gifts' might include:

- Tickets to events
- Cash
- Alcohol
- Tickets for travel

This list is not exhaustive.

4.1.2 Offering Business gifts: business gifts are primarily aimed at thanking customers and suppliers for their custom and loyalty, only authorised gifts may be given.

4.1.3 Receiving Hospitality: the acceptance of corporate hospitality must be transparent; all invitations must be reported to the company before an employee accepts any invitation. The following areas are exempt while attending conferences, seminars, sponsored by third parties.

- Business and travel expenses incurred
- Normal business lunches and meals

4.1.4 Donations to organisations: No donations should be made to charities, political parties or other organisations without approval.

5 Records: The Company will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if their report is unfounded.

6 Non-Compliance

- 6.1 Failing to observe Company policy may lead to disciplinary action in accordance with the Company's Disciplinary Procedures. Furthermore, the matter may be reported to the police.
- 6.2 In the event of a breach of the policy by other organisations, or individuals, the Company will take appropriate action through either the employer of the individual or through legal action.

7 Monitoring Policy

- 7.1 The policy will be monitored on an on-going basis to ensure that it addresses issues effectively.
- 7.2 The following will be monitored:
 - That all individuals working for the Company are advised of the policy.
 - Assessment of any reported incident or related occurrence.
- 7.3 Monitoring of the policy is essential to assess how effective the Company has been to establish control of its obligations.