



# Anti-Bribery and Corruption Policy

**Applicable to:**

All persons within HBC

**Effective from:**

March 2024

**Policy/Guidance Number:**

(P.2) V1

**To be reviewed by:**

January 2027

**Staff responsible for revision:**

Board of Directors

**Linked documents:**

Ethics policy

Gifts and hospitality policy

Employee purchases

Declaration of interest policy

Associated guidance notes

**Versions:**

Version 1 – January 2026

## Overview

This policy addresses our zero-tolerance approach to all forms of bribery and corruption. All employees must be aware of, understand and follow this policy in full and adhere strictly to relevant UK laws, in particular the Bribery Act 2010.

It outlines our appropriate and proportionate steps to ensure that we don't directly or indirectly become involved in bribery or give into demands of bribery, and also to ensure that we act with honesty and transparency in all dealings. We promote employee awareness and continue to introduce and monitor management control systems to enforce this policy.

The policy sets out our requirements relating to offers of hospitality and gifts either given or received, and the position regarding facilitation payments.

Managing directors and department heads must sign a monthly notification form identifying any awareness of a breach of this policy.

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## 1. Introduction

HBC (“we”, “our”) value our longstanding reputation for ethical behaviour and integrity. Conducting business with a zero-tolerance approach to all forms of corruption is central to our values, image and reputation. This policy sets out the standards we expect of all employees in relation to anti-bribery and corruption (in this context, “all employees” applies to any individual engaged by and working on behalf of HBC). In particular, all employees must adhere strictly to relevant UK laws, in particular the Bribery Act 2010.

The contents of this policy must remain proportionate to the risks faced and will be reviewed at least annually and revised and reassessed where appropriate.

As an employee you must:

- Be aware of this policy
- Ensure you understand it and ask questions if any aspect of it is unclear, and
- Follow it both to the letter and in spirit.

### 1.2. What does this mean?

Always ask yourself if your behaviour or actions are ones that you’d feel comfortable explaining to your family or reading about in a newspaper.

The policy is also relevant to third parties who perform services for or on our behalf. We expect third parties to adhere to this policy or have in place equivalent policies and procedures to combat bribery and corruption.

Our policy should be read in the context of a number of other measures we have in place to ensure there is effective communication about anti-corruption issues in connection with its business.

These include:

- Providing training to employees on anti-bribery issues.
- Communicating with people and companies associated with us to set out our approach to anti-corruption.
- Additional steps to encourage all employees to be vigilant and to report any suspicion of bribery or corruption. We promote a number of channels of communication for employees to raise concerns:
  - Board of Directorsor
  - Our whistleblowing helpline (0800 915 1571, see our whistleblowing policy for further details)
  - Hive open door (accessed on the intranet), and
- Ensuring that any concerns are investigated thoroughly and that any employee who makes a report in good faith shall suffer no detriment from doing so.

- 1.3. We will take firm action against any people or other parties we discover are involved in bribery or corruption. Any breach of this policy will result in disciplinary action under

the gross misconduct provisions of our disciplinary and dismissal procedures. This can include summary dismissal in any case where an employee has been found to have given or received a bribe.

- 1.4. Failure by any employee to report instances of bribery or corrupt activity can also result in disciplinary sanctions, especially where there is evidence that an employee has attempted to cover up or disguise another's wrongdoing.

## **2. The policy**

- 2.1. We adopt a zero-tolerance approach to bribery and will take appropriate and proportionate steps to ensure that we:
  - Don't directly or indirectly become involved in bribery
  - Don't give into demands or requests that amount to bribery
  - Act with honesty and transparency in all our dealings with others
  - Promote employee awareness of the policy and offer training where needed
  - Continue to introduce and monitor management control systems, which assist in enforcing the policy, and
  - Raise awareness of the risks of bribery and of our zero-tolerance approach.
- 2.2. It is a criminal offence to offer, promise or give a bribe, or to request, agree to receive or accept a bribe. A bribe doesn't need to be a monetary sum. It can be any form of advantage. A contract doesn't need to have been won for a bribery or corruption offence to have been committed. Similarly, a recipient doesn't need to benefit personally from a bribe. Bribery can occur in the private and public sector
- 2.3. We operate under the following principles:
  - We engage and pay agents and other third parties only for legitimate services.
  - We operate a robust gifts and hospitality policy in addition to this one.
  - We promote employee awareness of, and compliance with, company policies against bribery and corruption through appropriate dissemination of our own procedures (including disciplinary procedures), policies and training programmes on induction and subsequently.
  - We adopt management control systems that discourage bribery and corruption, and adopt financial and tax accounting and auditing practices that prevent the establishment of "off the books" secret accounts or the creation of documents which don't properly and fairly record the transactions to which they relate.
  - We do not make illegal or inappropriate contributions to candidates for public office or to political parties or to other political organisations.
  - We raise awareness of the need to combat bribery and corruption with our business partners and support initiatives designed to reduce the risks of it.
  - We publish (and update as appropriate) guidance notes in support of this policy and provide ad-hoc advice whenever requested.
  - We operate in accordance with our values

- 2.4. All offers of hospitality and gifts either given or received must be recorded in a register maintained the Managing Director. These registers, and any associated reports, must be submitted half-yearly to the Finance Director as part of our internal controls reporting procedure.
- 2.5. Any gift above £10 in value due to be given to a public official must be approved in advance by a Company Director.
- 2.6. This policy consists of two straightforward rules that all employees must adhere strictly to:
  - Don't offer, promise or give bribes, and
  - Don't request, agree to or accept bribes.
- 2.7. The risks of corruption are not always obvious. Accordingly, these simple requirements should be followed:
  - Don't make payments or offer inducements (including gifts or hospitality) to someone, or favour them in any other way, if you know that this will encourage or lead to any misuse of their position or improper performance of their function.
  - Don't misuse your position (or perform your functions improperly) by seeking or accepting payments or other favours for yourself or others.
  - Don't deliberately use any reward or advantage to try to influence foreign public officials for business reasons. If you need to promote our business with a foreign public official, always check in advance with the Finance Director.

### **3. Seeking further guidance**

- 3.1. Inevitably, deciding what's acceptable may not always be easy. Consult our gifts and hospitality policy where relevant. If you are in any doubt as to whether a potential act could give rise to bribery or corruption concerns, please speak immediately to the Company Director.

### **4. Sponsorship, charitable and political donations**

- 4.1. All sponsorship and donations made on our behalf must be approved in advance by the Finance Director.

### **5. Facilitation payments**

- 5.1. Facilitation payments are regarded as bribes under the Bribery Act 2010, are illegal, and are prohibited by this policy. They are typically small, unofficial payments paid to speed up an administrative process or secure a routine government action by an official and are most frequently encountered in foreign jurisdictions with perceived high corruption risks.
- 5.2. Where an employee (or someone acting on our behalf) suspects a demand for a payment is a request for a facilitation payment, they must report it immediately to the Company Director.

## **6. Record keeping**

- 6.1. We must keep accurate financial and other records and have appropriate internal controls that will evidence the business reason for making payments to any third parties (such as anyone who provides services for or on our behalf). Employees must apply the principles contained in this policy to all aspects of their work.

## **7. Responsibilities**

- 7.1. All employees must read, understand and comply with this policy.
- 7.2. HBC's Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations and to ensure everyone complies with it.
- 7.3. The Company Director has primary responsibility for implementing this policy and monitoring its effectiveness.
- 7.4. Management at all levels are responsible for ensuring that those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

## **8. Fraud and corruption notification**

- 8.1. Directors and heads of departments are to sign off the monthly notification form attached to this policy.
- 8.2. Directors and heads of departments are to introduce sign-off by other departments (if necessary) to be returned to them.
- 8.3. Notification forms are to be sent by email to the address given on the form by the fifth of each month.

Fraud and corruption are a risk to HBC, and we require monthly returns to be completed in the form of the attached return, to confirm whether you have become aware of any breach of this policy, or of any other instance of actual or attempted fraud or corruption.

- 8.4. If you have any queries, please contact the legal team for further information.