

# Brannan policy document

## Anti-bribery policy

### Definition of bribery

Bribery is committed when an inducement or reward is provided, in order to gain any commercial, contractual, regulatory or personal advantage for S. Brannan & Sons Ltd or another party.

### Company policy on bribery

S.Brannan & Sons Ltd prohibits:

the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company by any individual employee, agent or other person or body acting on the Company's behalf in order to gain any commercial, contractual or regulatory advantage for the Group in a way which is unethical or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

The offence of bribery will be treated most seriously and constitutes gross misconduct in the company rules.

### Company policy with relation to receiving gifts:

S. Brannan & Sons Ltd does not prohibit the receiving of appropriate gifts or hospitality and recognises that to refuse a gift in certain circumstances and/or countries would cause offence to our trading partners.

An acceptable gift is one that would be judged by a reasonable person to be justifiable.

Repeated and regular offers of gifts should be declined.

A gift should not be accepted for something in return.

### Company policy with relation to offering gifts:

S. Brannan & Sons Ltd accepts the giving of promotional items or gifts on a festival or at another special time, for a token value only.

### Raising concerns and asking for guidance

Decisions as to what is and what is not acceptable may be difficult.

If any employee is in doubt as to whether a potential act constitutes bribery, the matter should be referred to a director of the Company.

Employees are encouraged to raise concerns about, or suspicion of, malpractice at the earliest possible stage and no employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

This policy is available for customers and members of the public on request or via our website: [www.brannan.co.uk](http://www.brannan.co.uk).



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Managing Director

20th June 2024

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Date