



ANTI-BRIBERY & CORRUPTION POLICY

Board

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Anti-Bribery & Corruption Policy

Introduction

It is the policy of Treatt Plc, its subsidiaries and associated companies worldwide ("Treatt Group") to maintain stringent standards of ethics in the conduct of its business affairs. The Treatt Group does not tolerate bribery and corruption. The conduct of Treatt Group directors, officers, employees and those acting on behalf of the Treatt Group is essential to maintaining these standards. This policy has been adopted by the Treatt Plc Board and extends to business dealings and transactions in all countries in which the Treatt Group operates.

All those employed by the Treatt Group must comply with this Anti-Bribery and Corruption Policy and any updates made from time to time. Any breach of this policy will be regarded as a serious matter.

No employee will suffer demotion, penalty or other adverse consequence for refusing to pay bribes even if such refusal may result in the Treatt Group losing business.

The Treatt Group expects its agents, business partners, suppliers and contractors who perform services on its behalf to act with honesty and integrity and in accordance with Treatt's Supplier Code of Conduct. The Treatt Group will, where appropriate, include clauses in respect of bribery and corruption in contracts offered to any such third parties.

Definition of Bribery

Bribery is the offering, promising, giving, accepting or soliciting of gifts, money, hospitality or other advantages as an inducement for an action which is illegal, unethical or a breach of trust.

A bribe may take many forms, but will typically involve corrupt intent. A bribe could be the:

- direct or indirect promise, offering, or authorisation, of anything of value
- offer or receipt of any kickback, loan, fee, reward or other advantage
- giving of aid, donations or voting designed to exert improper influence
- giving of facilitation payments, being small payments made to secure or speed up routine actions, usually by public officials

For the purpose of this policy, whether a bribe involves a government official or employee or a representative of an organisation in the private sector is irrelevant.

Compliance with Anti-Bribery Laws

Under the UK Bribery Act 2010 and other similar legislation across the world, bribery is a criminal offence for which the penalties, for both individuals and companies, are severe. The Bribery Act 2010 extends the offences to include companies which fail to implement adequate procedures to prevent such acts by those working for them or on their behalf, wherever in the world the act takes place.

In order to comply with this policy and relevant legislation, Treatt Group employees shall adhere to the following principles:

1. Business shall be conducted in compliance with the highest professional and ethical standards and with the laws of all countries in which the company does business.

2. Company funds or property shall not be used for any unlawful, improper or unethical purpose or in contravention of this policy.
3. No acts of bribery shall be committed by, directly or indirectly, promising, offering, giving, accepting or soliciting any money, gift, hospitality or other advantage as an inducement to obtain, maintain or facilitate any ***improper*** performance.
4. Anyone engaging others to provide services to the Treatt Group or to act on its behalf shall undertake appropriate due diligence and risk assesses the appointee to determine the extent of the Treatt Group's exposure to an offence.
5. Anyone engaged to provide services to the Treatt Group or to act on its behalf be requested to sign Treatt's Supplier Code of Conduct, which includes anti-bribery provisions. Signed copies shall be returned to the Legal Department.

Gifts, Hospitality and Expenses

The giving and receiving of gifts and hospitality and the payment of expenses are permitted where they are transparent, proportionate, reasonable and within the laws of the country in which they are given or received. They are expressly prohibited where they could influence or be perceived to be capable of influencing any material transaction.

Gifts

Gifts include goods or services given as a mark of friendship or appreciation and are given without the expectation of receiving anything in return.

Cash or cash equivalents (lottery ticket, gift voucher or gift cheque) shall not be offered or accepted in any circumstances.

No gifts, other than those of a nominal value such as pens, mugs, calendars etc or perishable foodstuffs shall be given or retained by employees. As recognition that all staff contribute to the performance of the Treatt Group, gifts which exceed a nominal value shall be passed to HR for inclusion in a prize draw, in which all staff shall be entered, or to be donated to charity. Any gifts passed to HR must be accompanied by the name of the donor.

Hospitality

Hospitality may include occasional business meals, tickets to entertainment, social or sports events in order to initiate or develop relationships with business people or third parties. The acceptance of casual hospitality such this is acceptable within reasonable bounds as long as it is a normal and appropriate expression of business courtesy.

Employees shall exercise their own judgement in giving or receiving hospitality to the amount of the value limits set out in Schedule 1 to this policy. Any hospitality given or received in excess of these limits shall be notified to the local Bribery and Corruption Officer providing the estimated value of the hospitality and the details of the recipients or donors. These details shall be recorded in the register of gifts, hospitality and expenses. Where it is known prior to giving or receiving hospitality that the value may exceed the value limits, advance approval must be sought from your line manager.

If you are in any doubt of the value of the hospitality to be received you are advised to exercise caution and notify your line manager and the Group Legal Counsel.

Expenses

Expenses are the reimbursement of travel and other related expenses incurred by a customer or prospective customer or business partner for business purposes.

Donations

The Treatt Group shall not make any direct or indirect contributions to political parties, organisations or individuals engaged in politics.

The Treatt Group will ensure that charitable contributions and sponsorships are not used as a means of bribery and the value of its charitable contributions and sponsorships shall be publically disclosed in the annual report and accounts.

Reporting

The prevention, detection and reporting of bribery and corruption is the responsibility of all employees. Any suspected or actual instances of non-compliance with this policy, any attempts made to bribe Treatt Group employees and any demands made for bribes or facilitation payments shall be reported in the first instance to your line manager, supplying all pertinent information to assist in an internal investigation of the relevant circumstances. Reports will be dealt with in the strictest confidence with no risk of reprisal.

Alternatively, if you feel unable to report the matter to your line manager, please report it in accordance with the Whistleblowing Policy.

If there is any doubt as to whether a potential act constitutes a breach of this policy, the matter should be referred to the Group Legal Counsel.

Training

All employees will be required to confirm that they have watched the training video and read and understood this policy shortly after employment and thereafter those employees who have contact with third parties as part of their role will be required to undertake regular refresher training.

Monitoring and review

Treatt Plc will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate.

Schedule 1

Value Limits for Hospitality

Category	Value limit
Treatt Plc Directors and Treatt USA Vice-Presidents	£1000
Group Senior Managers	£500
All other employees	£200

Review History					
Date of first issue: November 2011			Standard review period: Two Years from last review date		
Date	Version no	Changes	Prepared by	Reviewed by	Approved by
28 June 2013	2	Changes to gifts and hospitality sections and Schedule 1	Anita Steer	Daemmon Reeve Richard Hope Anita Haines	The Board
15 May 2015	2	No Changes			The Board
16 May 2017	3	Clarification of limits for hospitality if overseas	Anita Steer	The Board	The Board
1 May 2019	4	Removing relevance of policy to agents and business partners as they are provided with the Supplier Code of Conduct instead	Anita Steer	The Board	The Board
29 April 2020	5	Reformatted onto new template	Anita Guernari		
7 May 2021	5	No Changes			The Board