



ANTI-BRIBERY POLICY

Anti-Bribery Policy

Date: December 2020 Version: 1.1 Next Review December 2021

Purpose

In2food is committed to complying with the laws and regulations of the countries in which its businesses operate and acting in an ethical manner, consistent with the principles of honesty, integrity, fairness and respect.

Bribery and the related improper conduct referred to in this policy are serious criminal offences for both the Company and any individuals involved.

Policy

In2food employees are required to understand and comply with this policy:

- Not give, offer, accept or request bribes, facilitation payments, secret commissions or other prohibited payments or engage in money laundering or cause any of them to be given, offered, accepted or requested
- Not approve any offers, or make, accept or request an irregular payment or other thing of value, to win business or influence a business decision
- Not offer or receive any gifts, entertainment or hospitality to or from public or government officials or politicians, without approval from the Chief Executive Officer
- Obtain required approvals for donations and sponsorship, and maintain accurate records of dealings with third parties
- Be vigilant and report any breaches of, or suspicious behaviour related to this policy

Definitions

The following table contains relevant definitions

Bribery	Offering, promising, giving or accepting a benefit with the intention of influencing a person who is otherwise expected to act in good faith or in an impartial manner, to do or omit to do anything in the performance of their role or function, in order to provide In2food with business or a business advantage that is not legitimately due. Offering a bribe will usually be sufficient for an offence to be committed
Facilitation payments	Generally, an unofficial payment made to a government employee or official to speed up, expedite an action.
Secret commissions	An example of this is where an employee of In2food pays a commission to a customer of In2food that is secret and undisclosed, to induce them to do business with In2food
Money laundering	A process where either an entity or a person hides an illegal source of income and disguises it to make it appear legal source of income.
Gifts, entertainment, hospitality	The offering or acceptance of gifts, entertainment or hospitality is for the purpose of general relationship building, is done in an open and transparent manner, and does not include cash or loans.



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Maintain accurate records	All accounts, invoices and other documents and records relating to dealings with third parties, must be prepared and maintained with strict accuracy and completeness. No accounts may be kept “off the books” to facilitate or conceal improper payments.
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In2food employees who wish to report a breach may be worried about possible repercussions. The Company will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken, refer to our Whistle-blower Policy.

To report a breach, contact your General and/or Branch Manager in the first instance or alternatively Human Resources.

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