



## Anti-Bribery and Corruption Policy

### 1. Purpose

This policy sets out the Company's commitment to preventing bribery and corruption in all its business activities. The Company conducts its business in an honest and ethical manner and takes a zero-tolerance approach to bribery and corruption.

This policy supports compliance with the **UK Bribery Act 2010** and applies to all persons working for or on behalf of the Company.

### 2. Scope

This policy applies to:

- All employees (permanent, temporary, and agency staff)
- Directors and officers
- Contractors, consultants, and freelancers
- Agents, intermediaries, and representatives
- Any third parties acting on behalf of the Company

It applies to all business activities in the UK and internationally.

### 3. What Is Bribery and Corruption

**Bribery** is offering, promising, giving, requesting, or accepting anything of value (financial or otherwise) to gain an improper advantage.

**Corruption** is the abuse of entrusted power for private gain.

Bribes can include:

- Cash or cash equivalents
- Gifts, hospitality, or entertainment
- Loans, discounts, or commissions
- Favourable treatment or business advantages
- Charitable donations or sponsorships made to influence decisions

### 4. Prohibited Conduct

The Company strictly prohibits:

- Offering or giving a bribe to anyone
- Requesting or accepting a bribe
- Bribing a foreign or domestic public official
- Making facilitation payments (small payments to speed up routine actions)

- Using third parties to carry out bribery on the Company's behalf

## **5. Gifts and Hospitality**

Reasonable and proportionate gifts and hospitality may be acceptable where they:

- Are given openly and transparently
- Are not intended to influence business decisions
- Are modest in value and appropriate to the circumstances
- Comply with local laws and company procedures

Gifts or hospitality must never:

- Be given in cash
- Be excessive or frequent
- Be offered during tender or contract award processes

Employees must declare gifts and hospitality in line with company procedures.

## **6. Facilitation Payments**

Facilitation payments are illegal under UK law and are not permitted by the Company, regardless of local customs or practices.

## **7. Charitable Donations and Sponsorship**

Charitable donations and sponsorships must:

- Be made in good faith
- Not be used to improperly influence decisions
- Be approved in accordance with Company procedures
- Be accurately recorded in the Company's accounts

Political donations are not permitted unless expressly approved by the Board.

## **8. Responsibilities**

### **Employees and Associated Persons**

- Must comply with this policy at all times
- Must report any concerns or suspicions of bribery or corruption
- Must complete required training

### **Management**

- Must lead by example
- Must ensure appropriate controls are in place
- Must support and encourage ethical behaviour

### **The Company**

- Will maintain effective procedures to prevent bribery
- Will investigate all reported concerns fairly and confidentially

## 9. Reporting Concerns

Employees are encouraged to report any suspected bribery or corruption as soon as possible.  
Reports can be made to:

- A line manager
- Senior management
- A designated whistleblowing email – [whistleblowing@holdsworthfoods.co.uk](mailto:whistleblowing@holdsworthfoods.co.uk)

No one will suffer retaliation for reporting concerns in good faith.



Rupert Holdsworth  
Managing Director



Jessica Ashcroft  
Finance Director



Gary Adnitt  
Sales Director



Millicent Holdsworth  
Compliance Director

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