

## **MATALAN RETAIL LIMITED**

### **ANTI-CORRUPTION AND BRIBERY POLICY FOR AGENTS AND SUPPLIERS**

#### **1. POLICY STATEMENT**

- 1.1 Matalan is committed to conduct its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery. We take our legal responsibilities very seriously.
- 1.2 We are bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.
- 1.3 We expect everyone we work with, including our suppliers and agents and to commit to the following principles:
- (a) Conduct business fairly, honestly and openly;
  - (b) Not to make or offer bribes, whether directly or indirectly, to gain business advantages;
  - (c) Not to accept bribes, whether directly or indirectly, to give business advantages

#### **2. WHAT IS BRIBERY?**

The UK Bribery Act 2010 creates four criminal offences:

- Offering, promising or giving a bribe (active bribery)
- Requesting, agreeing to receive or accepting a bribe (passive bribery)
- Bribing a foreign public official to obtain or retain business
- Failure by an organisation to prevent bribery by those acting on their behalf

*A bribe is "offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal or a breach of trust."*

### 3. **WHAT IS NOT ACCEPTABLE?**

In relation to any business conducted for, with or on behalf of Matalan, it is not acceptable for you (or someone on your behalf) to:

- (a) give, promise to give or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received or to reward a business advantage already given;
- (b) give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- (c) accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- (d) accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- (e) threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- (f) engage in any activity that might lead to a breach of this policy.

### 4. **QUESTIONS**

If you have any queries regarding this policy or what constitutes a bribe, these should be raised with your Matalan contact or the Matalan compliance manager who can be contacted on email as follows: [compliance\\_m@matalan.co.uk](mailto:compliance_m@matalan.co.uk).