



# RETAIL FURNITURE

## Bribery & Corruption Policy

### **Retail Furniture Ltd conduct is based on our commitment to act professionally, fairly and with integrity**

This is critical to our business model. Retail Furniture Ltd does not tolerate any form of bribery and corruption in any of our business dealings. This policy applies to all Retail Furniture Ltd Team Members and Management. Retail Furniture Ltd complies with the Bribery Act 2010 in respect of our conduct both domestically and abroad. We also comply with laws relevant to countering bribery and corruption in the countries in which we trade. The purpose of this policy is to set out our responsibilities, and the responsibilities of those working for us and to provide information and on how to recognise and deal with bribery and corruption issues.

### **All Team Members and Management must understand and comply with the following:**

- It is an offence to bribe another person, to be bribed, to bribe a public official and for a company to fail to prevent bribery (Bribery Act 2010)
- As a piece of UK legislation fines and imprisonment can be imposed on individuals who fail to comply
- Management or Team Members must never offer, promise or give financial or other advantage to any person or entity in order to solicit or reward improper performance by them
- You must never accept or agree to receive financial or other benefits as a reward for the improper performance of contractual your duties
- You must never threaten or retaliate against another person who has refused to engage in any activity that might lead to a breach of this policy
- Where your role requires you to give and receive hospitality this should always be in a reasonable and proportionate manner. Further guidance on this topic is set out below
- Corruption is the abuse of private or public office for personal gain
- You must read this policy carefully and revert any questions to the Managing Director

### **Gifts and Hospitality:**

This policy does not prohibit appropriate hospitality or gifts (given and received) to or from third parties, providing that:

- You have disclosed it to the Managing Director in advance
- It is not made with the intention of rewarding, inducing or influencing a third party in order to gain any improper advantage, benefit or favour
- It complies with local law
- It does not include cash or a case equivalent.
- It is appropriate and is of an appropriate type and value (e.g. it is customary for small gifts to be during festive periods)
- It is given openly and not secretly



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Hospitality or gifts should not be offered to, or accepted from, government officials or their representatives. Where it is an accepted part of your role, you can offer and accept a reasonable amount of hospitality for the purposes of business development (you should approach the Managing Director if you are unsure about this).

### **You Responsibilities:**

- You must ensure that you read, understand and comply with this policy
- You must be open about gifts and hospitality given or received and you must disclose these to the Managing Director in advance (where it is possible to do so, or as soon as is practical afterwards)
- The detection, prevention and reporting of bribery and other forms of corruption are the responsibility of all those Team Members and Managers working for us. All Team Members and Managers are required to avoid any activity that might lead to, or suggest, a breach of this policy

Any employee who breaches this policy will face disciplinary action for gross misconduct.

### Record-keeping

Financial records will be kept up to date, which evidence the business reason for making payments to third parties and all expenses claims relating to hospitality, gifts or expenses incurred to third parties.