

Anti-bribery Policy

The Bribery Act 2010 (the “Act”) came into force in the UK on 1 July 2011 and has created three new criminal offences of bribery when:

- 1) one person bribes another person;
- 2) a person requests or receives a bribe;
- 3) a company fails to prevent bribery by a person acting on its behalf.

Jacques Vert Plc (the “Company”) has always taken its own ethical behaviour very seriously and is committed to countering bribery. In addition to the ethical guidelines outlined in its supplier manual, it has adopted with immediate effect the following policy on anti-bribery.

Anti-bribery Policy

The Company’s anti-bribery policy is fully endorsed by its board of directors. It prohibits the making or acceptance of bribes either directly or on its behalf to or from any person or company whether in cash or other inducement.

The Company’s anti-bribery policy is:

- notified to all its employees in order that they can recognise and avoid the use of bribery by themselves and others;
- advised to third parties with whom the Company conducts business;
- supported by risk assessments to identify those areas of the business that pose the greatest risk from bribery;
- monitored and reviewed on a continuous basis to ensure that its anti-bribery measures are kept up-to-date;

In addition the Company will:

- seek to avoid doing business with those parties who do not accept the Company’s values and who may harm its reputation;
- encourage all its employees to be vigilant and to report any suspicion of bribery by using the appropriate channels set up for this purpose;
- investigate all instances of alleged bribery;
- assist the police and other regulatory bodies in any investigation;
- take firm and vigorous action against anyone involved in bribery.

What is Bribery?

In addition to cash payments, bribes comprise non-monetary gifts, hospitality and other favours where the amount involved is not proportionate to the circumstances.

With regard to non-monetary gifts, for example bottles of wine given to an employee at Christmas, these may be kept by the recipient if their monetary value is less than £50. All gifts exceeding £50 must be sent immediately following receipt to the Company Secretary. This includes any series of individual gifts that collectively have an aggregate value in excess of £50, for example 6 bottles of wine. All such items will be included in a raffle in which all permanent employees will participate.

Hospitality is permitted subject to it being reasonable. As this is subjective, employees and those doing business with the Company should seek advice from the Company Secretary where there is any doubt whether the hospitality being offered is reasonable.

An example of reasonable hospitality might include an invitation to a restaurant or to an event such as Wimbledon provided the entertaining is not excessive.

An example of hospitality that is unreasonable will include a supplier paying for an employee's personal travel and/or accommodation.

Bribes also comprise payments and other favours committed by persons with whom the Company does business even where the Company is unaware of their existence. An example of this includes a supplier giving an inducement to another third party with regard to the business of the Company, say gaining priority in dealing with the Company's goods.