

# ANTI-BRIBERY POLICY

## Corporate Policy

### OBJECTIVE

Conduct our businesses in an ethical manner, with zero-tolerance for acts of corruption and bribery, and through practices in accordance with UK laws and the countries in which we operate.

### PURPOSE

Operate at the highest ethical standards striving for long-term success of our business and the communities in which we operate.

### IMPLICATIONS

- Pantaleon Group business units must identify and implement controls that mitigate the probability of occurrence of bribery, corruption, and fraud.
- Pantaleon Group business units must reject any kind of Bribery to and from any Third Parties.
- Pantaleon Group employees or Third Parties will not accept or offer anything of financial value or otherwise, to obtain any undue advantage.
- Pantaleon Group business units must commit to ensure that all donations, sponsorships and contributions are not, and must not be made, to obtain, retain, or gain any business or undue advantage.
- Pantaleon Group business units must maintain confidential speak-up mechanisms through which anyone without fear of reprisal may file a complaint of known or suspected cases of bribery, corruption, and fraud.
- The senior management in each business unit of Pantaleon Group will take appropriate actions against any employee or Third Parties found in breach of our zero-tolerance policy against corruption and bribery.
- Pantaleon Group business units must periodically review of the efficacy of the Anti-Bribery measures to create a functional, resilient, and sustainable system.
- The senior management in each business unit of Pantaleon Group must empower and recognize independence of the Office of Ethics and Compliance (OEC) to ensure the success of the Compliance Program.