



# sigma

RETAIL PARTNERS

## Our Anti-Bribery Policy

## Anti-Bribery Policy

We are committed to conducting our business with the highest level of integrity and in compliance with all applicable anti-bribery laws and regulations. Our Anti-Bribery Policy outlines our zero-tolerance approach towards bribery and corruption in any form. This policy serves as a guiding framework for our employees, contractors, agents to understand their responsibilities and obligations in preventing bribery and maintaining ethical business practices.

### Policy Guidelines

- Compliance with Anti-Bribery Laws:
  - We will comply with all relevant anti-bribery laws and regulations
  - We will familiarise ourselves with the specific requirements of these laws and ensure strict adherence
- Prohibition of Bribery:
  - We prohibit the offering, giving, receiving, or soliciting of any bribes, kickbacks or improper payments
  - We prohibit facilitation payments, which are small bribes made to secure routine actions or services
- Gifts, Hospitality, and Entertainment:
  - We will accept and offer business gifts, hospitality and entertainment only if they are of a reasonable and proportionate value, given openly and in compliance with applicable laws and regulations
  - Gifts, hospitality, or entertainment must never be offered or accepted with the intention of influencing a business decision or obtaining an unfair advantage
- Due Diligence:
  - We will conduct due diligence on our employees, contractors, agents to ensure they have a commitment to anti-bribery practices
  - We will assess the bribery and corruption risks associated with our business relationships and take appropriate measures to mitigate those risks
- Reporting and Whistleblowing:
  - We encourage all employees and stakeholders to report any suspected or actual instances of bribery or corruption
  - We will protect whistleblowers from retaliation and ensure that all reports are thoroughly and impartially investigated
- Training and Awareness:
  - We will provide regular training and awareness programmes to educate employees about the risks of bribery and corruption
  - We will ensure employees understand their obligations, responsibilities, and the consequences of non-compliance
- Record Keeping:
  - We will maintain accurate and transparent records of all financial transactions, gifts, hospitality, and entertainment provided or received
  - Records will be kept in accordance with applicable laws and regulations and made available for audit and review

- Continuous Improvement:
  - We will periodically review and update our Anti-Bribery Policy to reflect changes in laws, regulations, and best practices
  - We will monitor and assess the effectiveness of our anti-bribery measures and make improvements where necessary

## **Compliance**

All employees, contractors, agents, and business partners must comply with this Anti-Bribery Policy. Non-compliance may result in disciplinary action, termination, or legal consequences, as outlined in our company's disciplinary and legal policies.

By adhering to this Anti-Bribery Policy, we demonstrate our commitment to conducting business ethically, maintaining a level playing field, and fostering a culture of integrity within our organisation and in all our business relationships.

**This Anti-Bribery Policy is a living document which will be reviewed periodically to ensure its effectiveness and alignment with best practices and regulatory requirements.**

**We are committed to always improving and understanding the impact of our activities and how we can reduce or eliminate these. We will continue to monitor and report on our performance and develop action plans to ensure we continue to meet our commitments.**

