

Anti-Bribery and Corruption Policy for Service Providers & Customers in the territory of the United Kingdom (the "Nestlé Anti-Bribery Policy")

Nestlé¹ is committed to conduct its business ethically and in compliance with all applicable laws. This includes compliance with the UK Bribery Act 2010 (the "**Bribery Act**").

The Bribery Act applies to Nestlé, its Service Providers² and Customers³. Nestlé has provided you with a copy of this policy as part of our **adequate procedures** designed to prevent bribery by and through our Service Providers and Customers.

The purpose of this policy is to provide guidance to you as a Service Provider and Customer of Nestlé concerning compliance with the Bribery Act for your activities involving Nestlé in the UK.

Nestlé's Policy on Bribery and Corruption⁴

Nestlé has a zero tolerance policy towards bribery and corruption. Customers and Service Providers cannot bribe Nestlé employees, nor can you or Nestlé employees be involved in conduct that constitutes bribery.

We are committed to act professionally, fairly and with integrity in our business dealings and relationships, implementing and enforcing effective systems to counter bribery. Nestlé employees and others working with us or on our behalf i.e. Service Providers and Customers, should not offer, promise or give a bribe to anyone, and further shall not request, agree to accept or take a bribe from anyone. If a Nestlé employee asks for a bribe, as our Customer or Service Provider we count on you to let us know through the routes outlined in this Policy.

Bribery is a crime in most countries where Nestlé operates, and penalties can be severe and sentences significant. The Bribery Act not only makes offering or receiving a bribe illegal, (i.e. the person who gives or receives a bribe has committed a crime), but also holds UK companies liable for failing to prevent bribery by those working on its behalf, even indirectly (such as through agents, contractors, suppliers and intermediaries). The activities of Nestlé outside the UK are the subject of a separate policy.

Recognizing Bribery and Corruption

There are two main offences under the Bribery Act in the UK that we are concerned with here.

- i. **The paying or offering of bribes applies to you and Nestlé**
- ii. **The receipt or request for bribes applies to you and Nestlé**

By way of illustration, an offer or payment of a bribe to a Nestlé employee could involve:

- The direct or indirect promise, offer, authorization, or provision of anything of value to a Nestlé employee by any of your employees
- The offer or receipt of any kickback, loan, fee, commission, reward or other advantage to a Nestlé employee by any of your employees
- The giving of contributions or donations designed or stipulated to influence a Nestlé employee to act in your favour or that of your employee.

¹ Nestlé means and include Nestlé UK Limited, group companies and subsidiaries.

² **Service Provider** means and include suppliers, agents, representatives, consultants, brokers, contractors, or any other intermediary that provides services or goods to Nestlé.

³ **Customer** means and include a person, company, business entity who purchases goods or services from Nestlé

⁴ Please note that Nestlé employees may accept or offer reasonable meals and low value symbolic gifts intended as a token of thanks and in recognition of the importance of working relationship. By "low-value" we mean gifts such as pens, coffee mugs, T-shirts, flowers, diaries, calendars or a bottle of wine. This list is not exhaustive but gives a good idea of the type of gift that is permissible to accept or offer. It is recognized that inviting our employees for a meal or to an event is, within reason, an accepted part of conducting business. Such meals and invitations will only be accepted if locations are within UK or Ireland and in your presence.

The purpose of a bribe is often to obtain, retain or “facilitate” business

Here the Nestlé employee receiving the bribe is, or may be, in a position to provide that kind of business advantage to the party offering the bribe. This may involve sales initiatives, such as tendering and contracting; or, it may simply involve the handling of administrative tasks such as licenses, customs, taxes or import / export matters. It does not matter whether the act of bribery is committed before or after the tendering of a contract or the completion of an administrative task, it is illegal and is not permitted.

By way of illustration, a bribe on behalf of Nestlé, when your organization is engaged by Nestlé, could involve;

- i. Your employee(s), officers or directors**
- ii. Offering, promising or giving a financial or other advantage to induce or reward improper performance**
- iii. to any public function or any business function**

While acting on behalf of Nestlé as Service Provider or Customer, you or your employees, officers or directors or agents shall NOT offer or promise a bribe to a private business, individual, company or public functionaries to gain business advantage for us. This gain or advantage may involve sales initiatives, such as tendering and contracting; or, it may simply involve the handling of administrative tasks such as licenses, customs, taxes or import/export matters. It does not matter whether the act of bribery is committed before or after the tendering of a contract or the completion of an administrative task, it is illegal and is not permitted.

In order to ensure that we at Nestlé are compliant with the Bribery Act in our activities, we respectfully remind you as our trusted business partner that, while dealing with and/or on behalf of Nestlé, your obligations include:

- Zero tolerance to bribery in business dealings and transactions on behalf of Nestlé.
- You and your staff, directors, partners, sub-contractors, agents, engaged in relation to any matter on behalf of Nestlé should be aware of and abide by the Bribery Act, its requirements and this Nestlé Anti-Bribery Policy.
- You are under an obligation to report to us all suspected instances of bribery or attempted bribery in matters/dealings relating to us and our employees, so we can take appropriate steps to address urgently. In this regard please contact and report to:

Compliance Officer
Nestlé UK Ltd
1 City Place, Gatwick West Sussex RH60PA
Tel No: [020 8667 5168](tel:02086675168);
compliance@uk.nestle.com

Group Legal
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