



<b>Anti-Bribery Policy</b>
<b>Effective Date: 24<sup>th</sup> May, 2021</b>
<b>Version: 02</b>
<b>Last Review Date: 30<sup>th</sup> January, 2024</b>

**1. Policy Cover:**

This anti-bribery policy exists to set out the responsibilities of ADF Foods Limited ('ADF') and those who work for ADF in regards to observing and upholding ADF's zero-tolerance position on bribery and corruption. It also exists to act as a source of information and guidance for those working for ADF. It helps them recognise and deal with bribery and corruption issues.

**2. Policy Statement:**

ADF is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. ADF has zero-tolerance for bribery and corrupt activities. ADF is committed to acting professionally, fairly, and with integrity in all business dealings and relationships.

ADF will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which it operates.

ADF recognises that bribery and corruption are punishable and a fine. If ADF is discovered to have taken part in corrupt activities, ADF may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to its reputation. It is with this in mind that ADF commits to preventing bribery and corruption in its business, and take its legal responsibilities seriously.

**3. Applicability:**

This anti-bribery policy applies to all directors, employees, consultants, contractors, workers, agents, sponsors, or any other person or persons associated with ADF.

**4. What is and what is NOT acceptable:**

1. Gifts and hospitality.
2. Facilitation payments.
3. Political contributions.



4. Charitable contributions.
5. Gifts and hospitality.

ADF accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

1. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
2. It is not made with the suggestion that a return favour is expected.
3. It is given in the name of the company, not in an individual's name. It does not include cash.
4. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
5. It is given / received openly, not secretly.

#### **5. Employee Responsibilities:**

As an employee of ADF shall comply with the information contained within this policy.

If he/she has a reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, one must notify the management immediately.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. ADF has the right to terminate a contractual relationship with an employee on immediate basis if they breach this anti-bribery policy.

#### **6. Monitoring and Reviewing:**

ADF's management is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

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