



BRIBERY POLICY FEBRUARY 2020

Preamble

Lovejoys Wholesale values its reputation for honest dealing and financial probity. The Company recognises that any involvement in bribery will adversely affect its image and reputation. Its aim is therefore is to limit its exposure to bribery and comply fully with the Bribery Act 2011.

Policy

The Company Policy is to prohibit the offering, giving, solicitation or the acceptance of any bribe to or from any person or company by anyone acting on the Group's behalf.

Hospitality and Customer Assistance

This policy is not intended to prohibit traditional practices which foster strong customer relationships provided that the practice is proportionate and properly recorded. Examples would include: appropriate hospitality, gifts at shows, Christmas or other special occasions, resources to assist a customer or supplier facing an exceptional difficulty.

If there is any doubt as to whether a potential act constitutes bribery, the matter should be referred to the a Director

Employee Responsibility

The prevention and detection of bribery is the responsibility of all employees. Any suspicion of bribery can be reported confidentially to Ben Mortimer, Director.

Investigation of allegations

The Company will fully investigate any allegation of bribery involving employees, customers or suppliers. If necessary, details of the allegation and investigation will be passed to the Police.

Employee Discipline

The Company regards any involvement in bribery as an act of Gross Misconduct for which the most severe disciplinary sanctions will be applied.

Ben Mortimer
February 2020