

Anti-Corruption & Bribery Policy

2021



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Bendon believes that corporate compliance is an essential ingredient to success. That is why we hold our employees and business partners, including suppliers and their sub-contractors to the highest ethical standards. Our key stakeholders – customers and employees – likewise demand that we conduct ourselves with honesty and integrity in all markets where we do business. Time and again, history has shown that unethical behaviour compromises productivity, erodes confidence and ultimately undermines success.

INTRODUCTION:

This Anti-Corruption and Bribery Policy applies to all employees, officers, directors (hereafter referred to as ‘employees’) and third parties including suppliers and their sub-contractors acting on Bendon’s behalf, in all countries where Bendon operates.

Below we set out rules and procedures each Bendon employee, supplier and sub-contractor is expected to review, understand and follow. Any questions or doubts should be addressed to Bendon’s anonymous compliance team via email ethicalsourcing@bendon.com

GENERAL PRINCIPLES:

Corruption means offering, promising, accepting or soliciting – either directly or through an intermediary – anything of value in exchange for an action which is illegal or a breach of trust. “anything of value” means more than just cash and includes for instance:

- Shopping gift cards
- Gifts
- Entertainment -including meals
- Travel
- Discounts
- Offers of employment
- Promises to pay debts, loans or advances
- Personal favours

Government Official means any employee or official working in the public sector and representatives of companies owned or controlled by the government or international government organizations. This includes:

- Elected, appointed and commissioned officials
- Officers, employees, or consultants of a government, government agency or entity, regardless of title or seniority
- Officials of a political party
- Employees of state-owned or state -controlled enterprises, regardless of title or seniority
- Spouses and other immediate family members of any Government Officials

STRICT PROHIBITION OF CORRUPTION

Bendon strictly prohibits corruption in any form. This prohibition applies to items directly or indirectly given to, or received from any person and entity including government agencies, government officials, commercial business partners (e.g suppliers, sub-contractors), individuals or relatives of any of those, where the item is given or received in exchange for an improper business benefit or commercial advantage or to strengthen a business relationship. The above prohibition applies regardless of whether the item of value involves the use of corporate or personal resources.

REPORTING HOTLINE AND DUTY TO REPORT

All employees, suppliers and sub-contractors must immediately report corruption, including suspected or attempted corruption. Reports must be made to Bendon compliance email: ethicalsourcing@bendon.com
Reports may be made anonymously. If a reporter gives his/her identity, it will remain confidential to the extent permitted by law. Employees may be subject to disciplinary action if they are aware of corruption and do not report it.

Bendon will not take any adverse action against an employee for reporting a violation of this policy, or for cooperating in investigations relating to possible Policy violations, provided that the employee acted in good faith

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and with reasonable belief that the information provided was true. Likewise, Bendon will not tolerate retaliation by others against any such employee.

PENALTIES FOR NON-COMPLIANCE WITH THIS POLICY

Failure to comply with this Policy may result in disciplinary action up to and including termination of employment or of business relationships with suppliers, sub-contractors.

ACKNOWLEDGEMENT

All employees, suppliers and their sub-contractors are accountable for knowing and abiding by this Policy. Bendon will monitor compliance and periodically require employees, suppliers and sub-contractors to confirm that they have received and read this Policy, understand it and are complying with it.

BENDON ACKNOWLEDGMENT

Name: Kirsty McKeown

Role in Company: GM Merchandise & Planning

Date: 12-Aug-2021

Signature 

VENDOR ACKNOWLEDGEMENT – ANTI-CORRUPTION AND BRIBERY POLICY

By signing the below, you acknowledge that you have read, understood and agree to the requirements and terms set out in this agreement.

Vendor to complete:

Vendor name:	
Contact name:	
Contact number:	
Contact Position / Title:	
Signature:	
Date:	
Company Stamp:	