

# REISS

## Anti-Bribery and Corruption Policy

The purpose of this Policy is to:

- Set out the responsibilities of Reiss in preventing bribery and corruption.
- Provide information and guidance on how to recognise and deal with bribery and corruption issues.
- Set out standards of conduct, so that everyone can comply with the law.
- Encourage individuals to speak up if they have any concerns.

This policy applies to Reiss employees, volunteers, freelancers, contractors and organisations working with or on behalf of Reiss.

Reiss takes a zero-tolerance approach to bribery and corruption and will abide by all laws relevant to anti-bribery and corruption everywhere it operates. However, Reiss remains bound by the laws of the UK, including the Bribery Act 2010 (the “**Act**”), in respect of its activities both in the UK and abroad. Under the Act, bribery and corruption are punishable for individuals by up to 10 years’ imprisonment and if Reiss was found to have committed an offence, including failing to prevent bribery, it could face an unlimited fine and face damage to its reputation. It therefore takes its legal responsibilities very seriously.

Reiss considers any breaches of this Policy to be a serious offence, which may result in disciplinary measures including the summary dismissal of Reiss Employees or the termination of its business relationship, as well as reporting to relevant authorities where appropriate.

### What is Bribery and Corruption?

Bribery is the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

Corruption is the abuse of entrusted power for personal gain.

A bribe can take many forms, for example a direct or indirect promise or offer of anything of value, the offer or receipt of a kickback, fee, reward or other advantage, or the giving of aid or donations.

### Gifts and Hospitality

Reiss understands that the giving and receiving of gifts and hospitality where nothing is expected in return helps to form positive relationships with third parties, where it is proportionate and properly recorded. This does not constitute bribery and is not considered a breach of this policy.

All gifts and hospitality should meet the following criteria:

- proportionate, transparent, reasonable and for genuine purposes related to the aims and objectives of Reiss, for example to:
  - establish or maintain good business relationships
  - improve or maintain Reiss’ image or reputation
  - market or present Reiss’ products and/or services effectively
- it is not made or received with the intention of influencing Reiss or a third party to obtain or retain business or a business advantage.
- it does not include cash or cash equivalent (e.g. gift cards or vouchers).
- it cannot be viewed as lavish or excessive under local standards and customs and is only provided as a courtesy or token. If you are unsure whether a gift or hospitality could be viewed as lavish or excessive you should seek advice from your line manager.
- it is of an appropriate type and value and given at an appropriate time, considering the reason for the gift. If you are unsure whether a gift or hospitality is appropriate you should seek advice from your line manager;

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- it is given openly, not secretly;
- it is not offered to, or accepted from, government officials or representatives or politicians or political parties without the prior approval of a Director of Reiss.
- it is permissible under all applicable laws.
- if it has a value of more than £50 (or the equivalent thereof in local currency) it is accurately reported in Reiss' Gift and Hospitality Register.

Reiss appreciates that the practice of giving gifts or hospitality varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable.

Gifts or hospitality with a value of more than £100 (or the equivalent thereof in local currency) per person, either as one gift or added across one year, should not be given, offered or accepted unless the individual giving or receiving the gift has the approval of a Reiss Director.

It is not acceptable to:

- Make or accept any payments to or from a third party that are not directly in exchange for products or services.
- Give anything of value, including gifts or hospitality, to anyone with the expectation that this will influence the decision making of the recipient, or reward an advantage.
- Accept anything of value, including gifts or hospitality, from a third party that is offered with an expectation that the decision making of Reiss will be influenced in any way and may result in a business advantage.
- Accept, give, promise to give, offer or authorise the accepting or giving of anything of value, including payments, gifts or hospitality to any government official, politician or political party.
- Engage in any activity that might lead to a breach of this Policy.

## Record Keeping

Any gift or hospitality of a value of more than £50 (or the equivalent in local currency) is required to be accurately reported in Reiss' Gift and Hospitality Register, which is managed by the People Team.

It is the responsibility is for the individual giving or receiving the gift or hospitality to email the People Team within 7 days of receipt providing the following information:

- Description of item or event
- Reason for gift or hospitality
- Date received
- Value of item
- Name, address, telephone number, email address of provider and their relationship to Reiss
- Name, address, telephone number, email address of recipient and their relationship to Reiss

## How to speak up

Reiss relies on individuals to raise any issues related to bribery and corruption so that they can be dealt with.

If you have any suspicion or information that this Policy, or any anti-corruption law or regulation has been or may have been violated, you must immediately report it to your line manager, relevant Reiss contact or the People Director, or you can report it in accordance with the Whistleblowing Policy as soon as possible.

## Training and Communication

All Reiss Employees will receive Anti-Bribery and Corruption training annually, as well a copy of the Policy when they join Reiss. In addition, periodic reminders will be sent as appropriate thereafter.

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Third Parties working with or on behalf of Reiss will be informed of this Policy as appropriate as part of their engagement with Reiss.

## **Additional Points**

You must ensure that you read, understand and comply with this Policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of everyone at Reiss.

You must notify your line manager or the People Director as soon as possible if you believe or suspect that a conflict with this Policy has occurred or may occur in the future.