

Sainsbury's

# Group Suppliers' Anti-bribery & Corruption Policy

## Our Policy Antibribery and Corruption

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# Our Scope

Any supplier who supplies goods and services to Sainsbury's Group Companies whether that is goods for resale or goods and services that we use within our business.

## Why it matters

We operate a zero-tolerance approach to bribery. We expect colleagues, contractors and suppliers of goods and services to act at all times with honesty and integrity. The giving or receiving of bribes or any other corrupt payment has no place in our supply chains.

**As a supplier of Sainsbury's Group of companies, you must not give or accept any bribes or take part in any activity which could be deemed as bribery or fraud.**

## What is bribery?

Bribes are any inducement offered, promised or given to achieve a favourable outcome that would not otherwise be achieved but for that inducement, including but not limited to money. Other examples could include; offers of employment, charitable donations, political contributions, travel as well as gifts and hospitality.

## **Third Parties and associated persons**

As suppliers you are a Sainsbury's third party. You may also be an associated person if you act or perform services on Sainsbury's behalf. The definition of associated person within the Bribery Act is very broad. The types of services that will result in you being considered an associated person include but are not limited to obtaining permits, planning permissions or consents or alcohol licences on our behalf. It also includes acting as an agent during negotiations or buying as an agent on a supply trip.

Sainsbury's may be guilty if an associated person offers a bribe on behalf of Sainsbury's even if we were not aware that the associated party had paid the bribe.

If you are assessed as being an associated person, we will conduct additional due diligence before you can act on our behalf.

## **Bribing a public official**

Under the UK Bribery Act there is a separate criminal offence of bribing a public official. This is a very wide definition which includes council officials in the UK and other civil servants. Similar rules apply in most other countries.

**When working on behalf of Sainsbury's Group you must ensure that you always act with integrity. Any activity that constitutes an attempt to bribe a public official, or which may give that impression, is prohibited.**

## Facilitation payments

Facilitation payments are usually small bribes that are made to speed up administrative processes often at border or in ports. In some parts of the world these payments can be common and may even be considered “customary”. Even where this is the case, it is still bribery and Sainsbury’s takes a zero-tolerance approach

**You should never make a facilitation payment**

## Conflicts of Interests

A personal or business relationship with a Sainsbury’s Group Colleague **does not** automatically create a genuine conflict of interest. It depends on the nature of the relationship combined with the type of role you and the Sainsbury’s Group Colleague hold or perform.

### **You must declare**

1. Any interest you have with colleagues in Sainsbury’s or Argos before entering into any contracts, and/or
2. Where you provide services to our competitors

**So we can assess whether that represents a conflict.**

## **Gifts and Hospitality**

All Sainsbury's Group colleagues in the UK are required to declare any gift or hospitality above £25, including multiple gifts below £25 and seek permission before accepting hospitality. In other jurisdictions there is no lower limit. No personal gifts can be accepted in any jurisdiction.

**Please respect our colleagues' obligations and do not offer personal gifts or excessive hospitality**

## **Bribery Training**

Sainsbury's Group expects that contractors will have undergone anti-bribery training and understand that it is illegal to offer a bribe either on their own behalf or on behalf of Sainsbury's.

**Ensure your employees have undergone appropriate antibribery training.**

**Seeding**

If your company offers Sainsbury's Group colleagues goods, especially hardware, to try at home in order to improve their product knowledge, you must provide at the time of delivering the items formal confirmation of its ownership and associated conditions of use and return. We also require a completed audit trail showing the date the product was supplied and returned.

**Raising Bribery and Corruption Concerns****You must report any suspected bribery or fraudulent activity**

1. **Directly to your Sainsburys/ Argos contact , or**
2. **Via RightLine on 0800 085 2099**

We take any suspected bribery or fraudulent activity seriously and we may involve the police.



## Group Suppliers' Anti-bribery & Corruption Policy

The information in this document may be supported by other Sainsbury's Documents.

The information outlined in this document is in addition to all applicable UK and EU legislation.

Sainsbury's suppliers must ensure they meet all legal and regulatory requirements both at the point of manufacture and where the products are sold to the consumer. Whilst this document is intended to help you supply products suitable for the Sainsbury's brand (i.e. all brands owned by Sainsbury's), they do not absolve you of your responsibility to understand and comply with all the quality, legal and safety requirements for your products or the products you supply.

For the purpose of this document Sainsbury's Group Companies means Sainsbury's Supermarkets Ltd and Argos Limited only. Sainsbury's Argos is the trading name of both:

- 1) Argos Limited, Registered office: 33 Charterhouse Street, London, EC1M 6HA. Registered number: 01081551 and Argos (N.I.) LTD Upper Galwally, Belfast, BT8 6FX Registered number: NI1674996
- 2) Sainsbury's Supermarket Ltd, Registered office: 33 Charterhouse Street, London, EC1M 6HA. Registered number 03261722, UK and Sainsbury's Supermarkets (NI) Ltd, Upper Galwally, Belfast, BT8 6FX Registered number: NI1674962

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