

UK Anti-Bribery & Corruption Policy

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Manager:	Vice President Country UK/Ireland Cluster
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Scope:	All companies and employees of GEA Companies in UK
Distribution:	GEA Internet and emails

Scope

GEA companies in the UK (hereinafter “GEA UK”) is committed to being transparent and ethical about how it conducts business and treats its suppliers, clients and employees. We have zero tolerance for bribery or corruption and are committed to preventing bribery or corruption in connection with the conduct of our business.

Our Anti-Bribery Commitment

This policy applies to the employees, workers, contractors, volunteers, interns, and apprentices. It is our policy to carry out business fairly, honestly and openly. As such we have a zero-tolerance approach towards bribery in any part of our operation.

Bribery can include,

- **Giving a bribe**, when promising, offering or giving a financial or other advantage with the intention that someone improperly perform a function or activity;
- **Receiving a bribe**, when requesting, agreeing to receive or accepting a financial or other advantage in return for a function or activity being improperly performed; and
- **Bribing a foreign public official; when bribing a foreign public official intending to influence the foreign public official in their capacity as a foreign public official.**

If GEA UK commits any of these offences, directors and senior management could also be prosecuted for consent or connivance.

GEA UK can also be prosecuted for **failing to prevent bribery** if someone performing services for or on its behalf (like an employee or agent) gives a bribe or bribes a foreign public official. The only statutory defence to such a prosecution, is to demonstrate we had "**adequate procedures**" to prevent bribery.

Following the [GEA Integrity Policy](#) and this Policy, and the related processes, will help prevent bribery and could also be vital evidence to protect us if GEA is ever prosecuted for failing to prevent bribery.

Examples of bribery can include;

- extravagant hospitality or gifts received or given in exchange for a business advantage.
- Side payments to those involved in deciding to award a contract to GEA UK;
- Payments to individuals to speed up customs processes or the issuing of licenses even when GEA UK has a right to receive them.

How We do this

GEA UK has the following systems in place to discourage and prevent bribery in any form:

- **Risk Assessments**; periodical assessments will be undertaken and documented to assess the levels of risk GEA UK is exposed to in its business, particularly in relation to sales and

business development. Based upon such assessment preventative procedures are introduced proportionate to the bribery risks that the Company faces.

- **Top Level Commitment;** the Board and all levels of management within GEA UK are committed to preventing bribery by persons associated with it. They will aim to foster a culture within the organisation in which bribery is never acceptable.
- **Due diligence;** GEA UK applies diligence procedures, taking a proportionate and risk based approach, in respect of persons who perform or will perform services for or on behalf of the GEA UK in order to mitigate identified bribery risks.
- **Communication (including training);** GEA UK seeks to ensure that its bribery prevention policies and procedures are embedded and understood throughout GEA UK through internal and external communication, including training, that is proportionate to the risks it faces.
- **Entertainment and Expense Policy;** a clear entertainment and expenses policy that sets out that only reasonable hospitality, entertaining and gift giving expenses will be accommodated by GEA UK and should not induce either party to contract.
- **Company Induction;** all new employees will receive information about preventing, detecting and reporting bribery. If you suspect or if you are asked to accept or offer a bribe you must report this immediately to your Line Manager. GEA UK values a proactive anti-bribery stance by any employee.
- **Whistleblowing;** [Whistle blower system](#) GEA UK has GEA [Whistleblower Protection Policy](#) (whistle-blowing) in place. If you are concerned that bribery has occurred, may occur or is likely to occur we would encourage you to report your concerns.

Acceptance of Gifts

We recognise that as part of some roles employees may occasionally be offered a gift or be invited to an event. It is imperative that all employees understand our approach and obligations under the law with respect to this.

The unauthorised acceptance or solicitation of any incentive, inducement, bribe, gift or favour from any customer, contact, client, prospective buyer/seller or supplier of ours, which might in any way compromise the business relationship or our integrity is strictly forbidden. Failure to comply with this rule will be investigated under the GEA Investigation Policy and contravention may result in summary dismissal.

Please notify your Line Manager of anything that you feel may be inappropriate, who will provide guidance. However, to assist with your understanding; low cost individual gifts such as diaries, pens, calendars would not normally be regarded as compromising.

Non-Adherence to Policy

As we take our obligations to prevent bribery being committed very seriously, any breach of our anti-bribery and corruption policy or procedures will be considered Gross Misconduct and may result in dismissal.

Further Information

This policy will be reviewed regularly to reflect any legal developments and / or identified changes to our ABC risk exposure.

Date	Review and Revision
2021	Review without changes.
2022	Review without changes.
2023	Changes regarding GEA Whistleblower System and local requirements.