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## 1. What this policy covers

**1.1** This anti-bribery policy exists to set out the responsibilities of Rowlinson Knitwear Limited and those who work for us in regards to observing and upholding our zero tolerance position on bribery and corruption.

**1.2** It also exists to act as a source of information and guidance for those working for Rowlinson Knitwear Limited. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

## 2. Policy statement

**2.1** Rowlinson Knitwear Limited is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. Rowlinson Knitwear Limited has zero tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the world we operate.

**2.2** Rowlinson Knitwear Limited will uphold all laws relating to bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regards to our conduct both at home and abroad.

**2.3** Rowlinson Knitwear Limited recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

## 3. Who is covered?

**3.1** This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees and Board Directors at any level.

**3.2** In the context of this policy, third party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

**3.3** Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that the third party is required to comply with.

## 4. Definition of bribery

**4.1** Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting or soliciting something of value or of an advantage so to induce or influence an action or decision.

**4.2** A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory or personal advantage.

**4.3** Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

**4.4** Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from their immediate line manager, or the Head of People Services.

## 5. What is and what is not acceptable

**5.1** This section of the policy refers to four areas:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.

### 5.2 Gifts and hospitality

Rowlinson Knitwear Limited accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with local law.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key influential person, clearly with the intention of directly influencing them.
- It is not above the equivalent of £100 (Pounds Sterling).

**5.3** Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the individual's line manager or Head of People Services, who will assess the circumstances.

**5.4** As good practice, gifts given and received should always be disclosed to the individual's line manager or Head of People Services. Gifts from suppliers should always be disclosed.

**5.5** The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the line manager or Head of People Services should be sought.

### 5.6 Facilitation payments and kickbacks

Rowlinson Knitwear Limited does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action.

**5.7** Rowlinson Knitwear Limited does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

### 5.8 Political contributions

Rowlinson Knitwear Limited will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise that to do so could be perceived as an attempt to gain an improper business advantage.

### 5.9 Charitable contributions

Rowlinson Knitwear Limited accepts the act of donating to charities whether through services, knowledge, time, or direct financial contributions (cash or otherwise), and agrees to disclose all charitable contributions it makes.

**5.10** Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

**5.11** We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the Head of People Services.

## 6. Employee Responsibilities

**6.1** As an employee of Rowlinson Knitwear Limited you must ensure that you read, understand and comply with the information contained within this policy, and with any training or other anti-bribery and anti-corruption information you are given.

**6.2** All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. All employees are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

**6.3** If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Head of People Services.

**6.4** If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Rowlinson Knitwear Limited has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

## 7. What happens if I need to raise a concern?

**7.1** This section of the policy covers three areas:

- How to raise a concern.
- What to do if you are a victim of bribery or corruption.
- Protection.

### 7.2 How to raise a concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Rowlinson Knitwear Limited, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager, or the Head of People Services.

**7.3** Rowlinson Knitwear Limited will familiarise all employees with its whistleblowing procedures, so employees can vocalise their concerns swiftly and confidentially.

#### **7.4 What to do if you are a victim of bribery or corruption**

You must tell your line manager as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

#### **7.5 Protection**

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, Rowlinson Knitwear Limited understands that you may feel worried about potential repercussions.

Rowlinson Knitwear Limited will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

**7.6** Rowlinson Knitwear Limited will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

**7.7** Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

**7.8** If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager immediately.

## **8. Training and communication**

**8.1** Rowlinson Knitwear Limited will provide training on this policy as part of the induction process for all new employees working in areas where such awareness is required. Employees will also receive guidance on how to adhere to this policy, and will be asked annually to formally accept that they will comply with this policy.

**8.2** Rowlinson Knitwear Limited anti-bribery and anti-corruption policy and zero tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third parties at the outset of business relations, and as appropriate thereafter.

## **9. Record keeping**

**9.1** Rowlinson Knitwear Limited will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We understand that gifts and acts of hospitality are subject to managerial review.

## **10. Monitoring and reviewing**

**10.1** Rowlinson Knitwear Limited's Managing Director is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy and effectiveness.

**10.2** Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

**10.3** Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to their line manager.

**10.4** This policy does not form part of an employee's contract of employment and Rowlinson Knitwear Limited may amend it at any time so to improve its effectiveness at tackling bribery and corruption.

If you suspect, or have been offered a bribe which contravenes this policy, please notify the following people:

**Nicola Ryan**

**Head of People Services**

**T: +44 161 477 7791**

**E: [n.ryan@rowlinson-knitwear.com](mailto:n.ryan@rowlinson-knitwear.com)**

**Neil Ward**

**Director**

**T: +44 161 477 7791**

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