

# THE PIG



HOME GROWN HOTELS LIMITED

(THE PIG)

## SUPPLIER ANTI-CORRUPTION POLICY

### Commitment to Anti-Corruption Compliance

- THE PIG has a zero-tolerance approach to bribery and corruption and is committed to maintaining the highest standards of integrity and professionalism and conducting its business in compliance with all applicable laws, including the UK Bribery Act 2010 (“**UK Bribery Act**”).
- THE PIG expects all its partners and other third parties, including our suppliers (“**Third Parties**”), to act with integrity and comply with all applicable anti-corruption laws, including (but not limited to), the UK Bribery Act.
- This Supplier Anti-Corruption and Bribery Policy ("**Policy**") outlines THE PIG’s standards and expectations for all Third Parties regarding the prevention of bribery and corruption in any form throughout their business dealings with us. THE PIG will take appropriate action against any Third Party that violates applicable anti-corruption laws (including termination of the business relationship).

### POLICY

#### **Bribery, Kickbacks, and Other Improper Payments**

- Bribery can be described as the giving to or receiving by any person of **Anything of Value** as an improper inducement or reward for obtaining business or any other benefit.
- This policy is deemed to apply in our dealings with both **Public Officials** and Third Parties operating in the private sector.
- THE PIG prohibits the offering, giving, authorising, promising, soliciting, agreeing to, or accepting of – either directly or indirectly – any bribes, kickbacks, or other improper or illegal payments or transfers of Anything of Value in any way related to our business activities.
- THE PIG prohibits bribery to influence a Public Official, to obtain or retain business from any party, or to secure any **unfair business advantage**.
- THE PIG also prohibits facilitation payments (also referred to as “grease payments”) – which are small payments to Public Officials to expedite a routine, non-discretionary government task (such as speeding up approvals for a license or permit to which THE PIG is otherwise entitled, securing legitimate and permissible police presence, or obtaining public utility connections). However, official UK government 'fast track' payments for expedited services are permitted and must be properly documented.
- Third Parties must not establish, operate, or maintain any “slush funds,” unrecorded accounts, or off-the-books arrangements for the purpose of facilitating or concealing improper payments or activities. All financial transactions related to THE PIG’s business must be accurately recorded in accordance with all applicable laws and accounting standards.
- Third Parties must not do anything to induce, assist, enable, encourage, or permit another party

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– whether an employee of THE PIG, a Public Official, or another Third Party – to violate the provisions of this Policy. As well as complying with the specific prohibitions in this Policy, Third Parties must exercise common sense and judgement in assessing whether any arrangement could be perceived to be corrupt or otherwise inappropriate.

**Anything of Value:** Should be interpreted broadly and can include both tangible items – such as cash, gift vouchers, travel and entertainment expenses (including free or reduced cost use of THE PIG hotel rooms, restaurants and treatments), charitable donations, free goods, branded/promotional items, etc. – and intangible items, such as discounts, partnership opportunities, or job/internship offers (including for family members of the intended recipient).

Anything of value can also be disguised as legitimate goods or services which are not actually provided, or for which THE PIG or a Third Party was charged a falsified or inflated amount.

There is no “minimum” value that could trigger a violation of this Policy (even if the thing of value is at no cost to THE PIG or a Third Party); anything that could be of value to the recipient could constitute a bribe in violation of this Policy.

**Public Officials:** Includes any person holding a legislative, administrative or judicial position as an elected or appointed official of a national or local government, as well as any officer or employee of a government body or state-owned entity. Third Parties should be aware that the term 'Public Officials' encompasses a wider range of individuals than may be immediately recognised. This category includes, but is not limited to, employees, contractors and consultants working for public agencies, officials of international organisations such as the United Nations or the International Monetary Fund, the police and other criminal law enforcement agencies, regulators, some members of the Royal Family (where they are not purely ceremonial).

**Unfair business advantage:** Should be interpreted broadly to include any benefit, preference, or outcome in a commercial context that is obtained through improper, unethical, or illegal means, rather than through legitimate competition or merit. This could include access to confidential competitor information, access to favourable financing or other preferential terms, securing required government permits, certificates or licenses, improperly gaining access to customer lists, etc.

## GIFTS & HOSPITALITY

- Third Parties must conduct all dealings with THE PIG in a professional, transparent, and ethical manner. The offering or acceptance of gifts and hospitality can create conflicts of interest or the perception of improper influence, and must be handled with care.
- Reasonable and proportionate hospitality or gifts may be permitted if:
  - They are given or received in good faith and for legitimate business purposes;
  - They are not intended to influence a business decision or gain an improper advantage;
  - They are of modest value and comply with THE PIG’s internal policies and all applicable laws.

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- Third Parties are strictly prohibited from:
  - Offering or receiving any gift or hospitality while a business decision is under consideration, including decisions relating to tenders, contracts, renewals, or negotiations. This includes any promised gift or hospitality intended to be provided after such a transaction has concluded;
  - Offering or accepting any gift or hospitality that creates an appearance of impropriety, undue influence, or partiality, regardless of its actual intent or value;
  - Giving or receiving cash or cash equivalents (such as gift vouchers); and
  - Giving or receiving any gift (other than nominal promotional items, such as branded pens or notebooks) to or from any Public Official, regardless of value or context.
- THE PIG may make a business decision to provide the use of THE PIG hotel rooms and other facilities as part or full payment or other arrangement with Third Parties. Where such 'barter' is offered this **must** be recorded as part of the contract/agreement between THE PIG and the Third Party. Such offer will be made in respect of services provided or as part of a legitimate business to business exchange only and hospitality will never be provided to improperly influence, induce or reward business decisions.

### REPORTING VIOLATIONS AND RAISING CONCERNS

- If any Third Party becomes aware of any actual or suspected breach of this Policy, they should report this to their usual contact at THE PIG or, if that is not appropriate, via our whistleblowing facility which is hosted by an independent third party (Safecall) and is available 24/7, 365 days a year. Reports can be made:
  - By telephone, by dialing 0800 915 1571; or
  - Via the online reporting channel, accessible here: <https://www.safecall.co.uk/file-a-report/>.

Processes are in place to ensure that such complaints are investigated and appropriate action is taken.