

## **Ethics policy**

Budenberg has implemented a prohibition on the giving or receiving of any bribes, extra contractual gratuities, inducements, facilitation payments or similar, including compliance with the UE Directives and also the US Foreign Corrupt Practices Act, the US Racketeer Influenced and Corrupt Organizations Act and the UK Anti-Terrorism, Crime and Security Act;

- prohibition on the giving to customers or business contacts, or the receipt by employees, of any gifts, whether in cash or kind, unless in the course of normally accepted business entertainment and the subject of prior written approval by local management;
- prohibition of donations (including sponsorship, subscriptions or provision of employee time or facilities) to any political party or similar organisation;
- the purchase of legal title or license to all software in use;
- compliance with all export control regulations;
- avoidance of conflicts of interest between employee's private financial activities and their part in the conduct of Budenberg.

Budenberg has amended its global distribution policy with an addendum to existing and new agreements specifically worded to instill the company policy of 'non-corrupt' activities.