



NEVER ENGAGE IN BRIBERY AND CORRUPTION ^{1/2}



Corruption fuels poverty, undermines sustainable economic growth and prevents companies from doing business on a level playing field. As a global Company, we have a role to play in addressing these problems. That's why we have a zero-tolerance approach to bribery and corruption.

Always. Everywhere.

Often, we picture a bribe as an envelope filled with cash. But a bribe can take many forms. When given for the wrong reason, to unduly influence someone, anything of value can be a bribe. Gifts, tickets, donations, even advantages like an internship offer. No matter what form – big or small – bribery is always unfair, dishonest and wrong. It's bad for society and business. It can harm our reputation, and lead to fines and even imprisonment of those involved. We all have a duty to resist bribery.

- **Respect our zero tolerance policy, regardless of local practices or laws.** Bribery laws can be complicated and vary from country to country, but our policy is simple: we prohibit bribery – in all forms, in all places. Not just when dealing with public officials, but also in commercial dealings. Never offer, promise, give or accept a bribe, and don't ask or allow anyone else to offer or accept one for you. That includes in countries where corruption is culturally or historically seen as "part of doing business". Even if we risk losing business, always choose our Values over value.
- **Use caution when offering gifts, entertainment and hospitality.** Follow the principles and rules set out in the next section and avoid even the possibility that a business courtesy could be perceived as a bribe. If in doubt, don't proceed but ask for guidance. Better safe than sorry!
- **Be extra careful in dealings with public officials.** These are particularly high risk: even the appearance of illegal conduct can get you and our Company into trouble. Avoid offering anything of value to public officials (such as gifts, meals and tickets) but if you do, always get approval first via the [HeiDisclosure tool](#). When interacting with public officials, try to reduce face-to-face interactions by using electronic communications or e-government solutions (in areas such as licensing, customs clearance, procurement and taxes). This reduces the risk of someone asking you for a bribe.
- **Keep an eye on our business partners – never "outsource" bribery.** We can be held accountable for bribes paid by third parties working on our behalf, such as suppliers, distributors and consultants. So carefully select our partners, ensure they know about our Company's zero-tolerance approach and monitor their performance.
- **Never turn a blind eye to signs of corruption (red flags).** Always use your common sense and professional judgement. Remember: if something doesn't seem right, it probably isn't.
- **Don't make any facilitation payments.** These are small, unofficial payments to a public official to secure or speed up routine government actions or services, such as getting a licence or work permit. No matter how small, facilitation payments are bribes, and are therefore not allowed either.

What do we mean by a bribe?

By a "bribe", we mean anything of value (both financial and other advantages) that is given or received to improperly influence someone's actions. A bribe can take many forms, including:

- Money
- Gifts, entertainment and hospitality
- Discounts or free products
- Donations
- Other advantages and personal favours, such as offering someone (or their family) an internship or job

- **Speak up if you observe or suspect corrupt practices involving our Company, employees or business partners.** For example, if a supplier offers you a watch in exchange for awarding them a contract. Or an employee makes unofficial payments to a civil servant to get licences. By speaking up, you give us the opportunity to end or prevent corrupt practices. This is key to protecting our Company and our employees.



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Don't be fooled by common excuses for corruption

Most people understand the negative consequences of corruption, and disapprove of it. Yet it still happens, not just by “bad people” for personal gain. But why?

Here are some of the most common excuses used to rationalise or justify corrupt practices:

- It's always been done this way.
- Everyone else is doing it. If we don't, we lose business.
- I didn't know this was corruption!
- I didn't do it for me; I did it for the Company!
- What's the problem? No one gets hurt.
- My manager asked me to do it.

Watch out! None of these excuses will protect you or our Company against fines, imprisonment and damage to our reputation. And none of them are acceptable as excuses for breaching this policy. In line with our zero-tolerance approach, disciplinary action will be taken against anyone who engages in corruption – even for no personal gain. There is only one valid excuse to pay a bribe: to avert imminent threat to your or another person's life or safety. Promptly report such a situation to your Legal or Compliance team and file a Speak Up report, so that we can take appropriate steps, keep accurate records and prevent future incidents.

Remember!

If it doesn't feel right, it probably isn't. You'll never suffer adverse consequences for saying no to corruption, even if doing so results in the loss of business opportunities for our Company. Openly discuss dilemmas, ask for guidance and help, or use one of the [Speak Up channels](#).

This could happen...

A customs official demands a “special”, off-the-record fee to release perishable goods. It's a fraction of the value of the goods, and our customs agent offered to pay it in such a way that nobody will find out.

You might think...

I have no choice but to approve it, this one time. It's my job to protect the interests of our Company, so a small payment to avoid serious financial losses might be unethical but it is still the right thing to do.

But in fact...

Corruption is never an option. If you feel pressured or tempted to offer a bribe, think twice. You risk losing your job. “Doing it for the Company” may seem like a noble motive, but it's still illegal. As such, you put yourself and the entire Company at risk of prosecution, fines and reputational damage. If a public official solicits a bribe, keep calm and resist using [this Guide](#). Escalate the situation to management and Legal, so we can see how to get customs clearance the right (legal) way, or accept the losses. We recognise this is not always easy but know that you are supported.

THIRSTY FOR MORE?

[Anti-bribery Guide for Engaging Third Parties](#)
[Resisting Bribery Guide](#)

Keep learning
[Anti-bribery and corruption e-learning](#)

Have questions?
 Just ask! Reach out to a colleague from your local Legal or Compliance team or contact Global Business Conduct.

Have concerns?
[Speak Up!](#)

