

ANTI-BRIBERY AND CORRUPTION POLICY

Introduction

We are committed to acting professionally, fairly and responsibly, working alongside the Company's stakeholders to manage the social, environmental and ethical impact of our activity. We are committed to treating all our stakeholders fairly and with integrity. The Company recognises that bribery and corruption are a concern in both private and public business. The policy is clear: the Company will not tolerate any form of bribery or corruption within our business. The policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners. It extends to all our business activities wherever the Company operates. The remainder of this document sets out our policy in more detail.

This policy and any other guidelines applicable from time to time do not form part of any employee's contract and we may amend them at any time.

What is bribery?

Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting or seeking a bribe. It is a criminal offence in the eyes of the law and we will uphold all laws relevant to countering bribery and corruption in all the areas in which we operate.

All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your manager or contact the Corporate Legal and Compliance Department (compliance@blanc-fischer.com).

Specifically, you must not:

- (a) give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- (b) accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- (c) give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;

You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

Examples:

Offering a bribe

You offer a potential client tickets to a major sporting event, but only if they agree to do business with us.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

Receiving a bribe

A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Bribing a foreign official

You arrange for the business to pay an additional "facilitation" payment to a foreign official to speed up an administrative process.

The offence of bribing a foreign public official is committed as soon as the offer is made. This is because it is made to gain a business advantage for us. We may also be found to have committed an offence.

Gifts and Hospitality

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret. Gifts must be given in our name, not your name.

Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.

Hospitality or gifts accepted or offered will be subject to managerial review. In case of any uncertainties please contact the Corporate Legal and Compliance Department (compliance@blanc-fischer.com).

Donations

We do not make direct or indirect contributions to political parties.

Record keeping

You must declare and keep a written record of all hospitality or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

Responsibilities

This policy has the full support of the Company's Directors; the Managing Director is the Board Director having primary responsibility for implementing this policy.

Raising Concerns and Seeking Guidance

The prevention, detection and reporting of bribery is the responsibility of everyone associated with the Company. If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, it must be reported as soon as possible to a Director of the Company and the Corporate Legal and Compliance department.

Training and Communications

We will communicate this policy and the relevant guidance to all individuals who work for the Company. All individuals who work for us will receive appropriate training on how to implement this policy at their induction and regular training will be provided as necessary.

Monitoring and Review

The Board of Directors will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate. The Board will seek guidance as required from the Corporate Legal and Compliance department.

Sanctions

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect. Following investigation, the appropriate action will be taken against any proven transgressions which could include disciplinary action, claims for damages and prosecution under criminal law.

Issued by :	Board of Directors
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08 / April / 2019

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1. POLICY STATEMENT

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. RESPONSIBILITY FOR THE POLICY

- 2.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 The Company's Managing Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Company's Managing Director.

3. COMPLIANCE WITH THE POLICY

3.1 You must ensure that you read, understand and comply with this policy.

3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3 You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager as soon as possible.

3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Company's Managing Director immediately. If the matter is not remedied,

and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Company's Staff Handbook applicable from time to time.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

- 4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 4.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. BREACHES OF THIS POLICY

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

INTRODUCTION FROM THE COMPANY'S MANAGING DIRECTOR

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are proud of the steps we have taken to combat slavery and human trafficking. We have committed ourselves to respect ethical principles and the principles of the Caux Round Table.

ORGANISATION'S STRUCTURE AND BUSINESS

We are a part of the BLANCO Professional Group, which produces high-quality capital goods for commercial kitchens and industry, and has its head office in Oberderdingen, Germany. In the UK we operate out of St Alban's, Hertfordshire and sell Commercial goods for professional kitchens in the UK.

The BLANCO Professional Group operates in Central and Northern Europe, Eastern Europe and Asia.

OUR SUPPLY CHAINS

We obtain our supplies mainly from BLANCO Professional in Germany but also from external suppliers. We require that our supply chain partners adhere to a strict Code of Conduct which is sent to them as part of our contractual documentation.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics we have in place a rigorous supply chain code of conduct and take the appropriate steps, including terminating supplier agreements should a supplier not comply with the code of conduct.

TRAINING

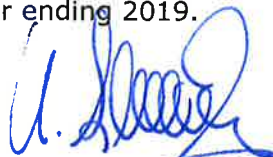
To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff and ensure visibility of this Statement and our Anti-Slavery and Human Trafficking Policy.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Raising awareness of slavery and human trafficking by bringing the contents of this Statement and our Anti-Slavery and Human Trafficking Policy to the attention of all staff by publishing it on our internal website
- Require the HR team that induct new employees to introduce employees to this Statement and the Policy.
- Send our supplier code of conduct to all external suppliers

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2019.



SIGNATURE MANAGING DIRECTOR

BLANCO Professional UK Limited

Date: 08.04.2019