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# ANTI-BRIBERY AND CORRUPTION AND GIFTS AND HOSPITALITY POLICY FOR THIRD PARTIES

## Statement from the Chairman

*John Lewis & Partners is committed to applying the highest standards of ethics and honesty in its business activities in the UK and overseas and we operate a zero-tolerance approach to bribery and corruption. The giving and receiving of bribes, and any other form of corrupt payment involving the Partnership is absolutely unacceptable.*

Sharon White – Chairman, John Lewis Partnership

## Our commitment

John Lewis & Partners (JLP) is committed to conducting business in an ethical manner and we expect anyone working for us or with us to operate with the utmost honesty and integrity.

This policy sets out the standards by which JLP expects its Business Partners (as defined below) to abide.

## About this policy

All Business Partners must read and comply with this Policy. Failure to do so may result in termination of the business relationships and legal liability.

In this Policy, “Business Partners” shall mean any person, organisation or third party anywhere in the world:

- (i) who performs or will perform services or supplies goods for or on behalf of JLP including (but not limited to) agents, intermediaries, consultants, contractors, sub-contractors, actual or potential goods or service providers, joint venture and franchise partners or retailers;
- (ii) with whom JLP has arrangements in place in relation to the purchase and resale of JLP products including, (but not limited to) buyers wholesalers and contractual counterparties;
- (iii) who has a business to business relationship with JLP.

“Partners” refers to individuals employed by JLP.

## Responsibilities

The prevention, detection and reporting of bribery and other forms of corruption is the responsibility of all Partners and Business Partners.

JLP does not tolerate behaviour that may contravene the Bribery Act 2010 or related legislation, including:

- Business Partners giving or receiving improper financial or other advantages whether directly or indirectly;

- Any conduct that could affect or appear to affect or influence an individual's conduct in the course of their professional or public duty.

### **Gifts and Hospitality**

Gifts and hospitality can form part of normal business relationships with Business Partners, provided that it is proportionate, appropriate and has a genuine business purpose.

However, it must never affect or appear to affect impartial decision making or conduct of Partners or other parties who work for or with JLP.

**In order to avoid potential conflicts of interest JLP discourages the giving or receiving of gifts or hospitality by Business Partners.**

### **Free Samples**

Business Partners may only offer free samples to Partners if they are offered solely for the purpose of making genuine business decisions. Business Partners must never use the offer of free samples to entice Partners or other parties working for or with JLP, to purchase a product or enter into or renew a contract.

### **Facilitation Payments**

“Facilitation payments” are transactions that often take the form of small cash payments to officials to “smooth the path” of a transaction, or expedite a routine.

Business Partners must never make, offer, solicit or encourage facilitation payments under any circumstances.

### **Tax Evasion**

Tax evasion and the facilitation of tax evasion in all forms is a criminal offence. JLP will not tolerate behaviour that facilitates Business Partners in evading their tax obligations, or conceal or turn a blind eye to tax evasion.

JLP is committed to reporting any such activity of which it becomes aware.

### **Record Keeping**

We expect our Business Partners to have processes in place to ensure that this Policy is complied with at all times when dealing with or acting on behalf of JLP.

We also expect our Business Partners to have processes in place to protect employees who provide information on unfair or inappropriate business dealings.

JLP requires that Business Partners keep financial records and have appropriate internal controls in place evidencing the business reason for giving and/or receiving payments from/to third parties.

### **Reporting concerns**

If you are ever in doubt about a situation and are concerned about a possible breach of this Policy, or have concerns about bribery or corruption in connection with JLP, you must let us know immediately.

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