

# Anti-bribery and Corruption Policy

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*“Valcambi condemns all forms of bribery and corruption. It promotes its products on the basis of their value, quality, price, competitiveness and sustainability, and not on the basis of improper advantages.”*

This document provides additional and complementary guidance of the Code of Conduct which form the cornerstone of Valcambi's commitment.

It applies in every market, even if local law is more placid. More stringent local laws or procedures always take precedence and local market and/or business rules may be introduced in order to detail specific local limits and procedures.

Valcambi is engaged in the international fight against bribery and corruption and participates in the UN Global Compact, which unites all relevant social actors.

Valcambi is committed to a strong work ethic and strictly prohibits its employees, service providers and agents from engaging in bribery and corruption, as well as any conduct which could give rise to the appearance or suspicion of such illicit activities. Bribery is defined as an offer or receipt of any gift, loan, fee, reward or other undue advantage to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust in the conduct of the enterprise's business.

## 1 Legislation

Swiss legislation on bribery (Art. 322<sup>ter</sup> – novies Swiss Criminal Code) applies to all employees of Valcambi.

Under the Swiss bribery law, it is an offence for a Valcambi employee to offer, promise or give an undue advantage (bribe) to another person, or to request, agree to receive, accept or secure the promise of such an undue advantage (bribe) from another person. Individuals may be subject to prosecution.

## 2 Gifts, meals, hospitality and entertainment

Refer to Valcambi's "Entertainment and Gifts Policy".

## 3 Facilitation payments

Valcambi employees must never pay or use third parties to pay an unofficial gratuity to government officials or employees in order to secure or expedite routine administrative actions, such as customs clearances, visas, permits or licenses.

## 4 Scholarships, grants, charitable contributions and non-commercial sponsorships

Valcambi may offer scholarships, grants, charitable contributions or non-commercial sponsorships to support the advancement of knowledge in science, nutrition, healthcare, or to support other socially beneficial purposes. They must never be made to procure an improper advantage to Valcambi nor be made conditional upon an individual's or organization's agreement to recommend or promote Valcambi products.

When a market or business provides this kind of economic support, it shall apply appropriate review and approval procedures, including an evaluation of the proposed recipient's reputation, track record, the suitability for the intended purpose, and the socially responsible benefits.

## 5 Political contributions

Valcambi has adopted a general policy prohibiting Valcambi affiliates from making political contributions to political parties or candidates.

## 6 Third party compliance and Valcambi due diligence

Valcambi takes care in its dealings with third parties and will never use them to pay bribes or engage in corrupt practices. Valcambi requires its suppliers, service providers, distributors and third parties acting on its behalf to act with integrity and to comply with anti-bribery laws. The decision to purchase from a certain supplier, to engage a service provider, or to appoint a commercial agent or distributor, must follow an appropriate due diligence process which is consistent with Corporate Guidelines. If it becomes clear or appears likely during

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the course of the relationship that a third party is engaging in inappropriate or illicit practices, then the Legal and/or Compliance Functions must be immediately consulted for guidance.

### **7 Records and documentation**

As part of its internal controls against corruption, Valcambi requires that all business transactions and financial flows be properly recorded, classified and documented, including those concerning the company's provision of gifts, hospitality, travel, entertainment, scholarships, grants and charitable contributions.