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Anti-Bribery & Corruption Policy

Greggs' values give a commitment to being open and honest, treating everyone with fairness, consideration and respect. These values help to underpin our reputation for maintaining our ethical standards across our business. In line with this reputation, we have a clear anti-bribery and corruption policy, forming part of our Business Conduct Policy.

Scope

This policy applies to **all Greggs' employees**. We also require any organisations or individuals providing services on our behalf to demonstrate their commitment to anti-bribery, as set out below.

Purpose

This policy sets out the responsibilities of all staff throughout Greggs to ensure that bribery does not take place within the organisation. As a company, we have a zero tolerance approach to any form of bribery.

Definition

Bribery is the offering or accepting of money, gifts, hospitality or some other benefit in return for providing something else of value. This could include:

- trying to influence a public official, for example to approve a planning application, or to overlook a breach of food safety;
- trying to persuade a supplier to provide his service more quickly, for example a utility provider supplying a new shop;
- choosing a supplier based on anything other than a robust selection process.

Company policy

Greggs prohibits the offering, giving, seeking or acceptance of any bribe in any form to any person or company by anyone acting on its behalf, in order to gain an advantage in an unethical way.

Business gifts & hospitality

This policy does not prohibit normal and appropriate hospitality (either given or received), provided it is not excessive, and is properly recorded. If you are invited to a corporate day or other event, you must seek approval from your Line Manager – this will only be given where the entertainment is reasonable and justifiable. Any such event valued in excess of £50 must be recorded on a Gifts & Hospitality Declaration Form, authorised by your Line Manager and forwarded to Head Office for the attention of the Company Secretary.

Any business gifts must be handled in line with the company's Gifts, Tips & Hospitality Policy.



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Greggs' expenses policy requires the disclosure of any entertainment provided by an individual member of staff, including a list of recipients. This ensures transparency of any hospitality which may be given by staff acting on behalf of the company to others, although this is very limited in extent.

Donations to organisations

Greggs makes significant charitable donations via the Greggs Foundation. Staff receiving business gifts and hospitality are encouraged to make a donation to the Foundation in respect of the benefit.

Any donations made to charities or other bodies must not be given in order to try and gain a business benefit. Greggs does not make political donations and no commercial sponsorship of political parties can be undertaken.

Business associates

Under Anti-Bribery legislation, we are liable for bribery committed by our associates, including agents and contractors. Greggs will only enter into a business arrangement when it is satisfied that its prospective partner operates ethically.

To achieve this, we will require any new agents who will supply services on our behalf to complete a brief standard questionnaire regarding their ownership and identity, and we will seek confirmation of their anti-bribery programme. We require all our associates to comply with our policy, or to their own anti-bribery policy provided it is at least as stringent, and will not do business with parties who will refuse to commit to this. Associates must also keep appropriate records to be able to demonstrate that their anti-bribery processes are adequate. Our standard contract terms will allow for indemnity or termination rights in the event of an associate breaching the bribery rules.

Facilitation payments

A facilitation payment is a fee paid to an official in order to persuade them to perform a task which is part of their normal job, but to do so more quickly than usual. Examples might be granting a permit or licence, or speeding passage through customs. These are illegal, and Greggs prohibits any such payments, regardless of the size. The one exception to this is where there is coercion or extortion – if your personal or family safety is under threat and you feel you have no option but to make a payment. This is highly unlikely, but in such circumstances you should make a payment, and report it immediately through our whistleblowing policy.

Annual declaration

All of our managers are required to sign an annual declaration confirming their compliance with our Business Conduct Policy. We also seek confirmation from our purchasing teams on an annual basis that they have complied with the policy's requirements.



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Roles and Responsibilities

Every member of staff at Greggs has a personal responsibility to behave in line with our values. If you are concerned that you are potentially being bribed, you should report this immediately to your line manager, in line with our whistleblowing Policy, “Do the Right Thing”. This policy provides details of who else you may contact if you have any concerns. All communications will be treated in confidence. We encourage staff to report their suspicions where appropriate, and endorse the policy at the highest level, through direct involvement of one of our Non-Executive Directors.

Investigations of alleged misconduct will be conducted in line with our disciplinary process. Any member of staff found to have offered or accepted a bribe will face disciplinary action in line with Greggs’ policies, and this may result in dismissal for gross misconduct.

The Chief Executive has lead responsibility for policy implementation within Greggs, and this policy demonstrates the Board’s commitment to eliminating any risk of bribery & corruption.