



Bernd Hummel Holding  
GmbH

Anti-Bribery  
and  
Corruption  
Policy



## **Anti-Bribery and Corruption Policy**

At Bernd Hummel Holding we believe that business should be conducted honestly, fairly and with respect for people, their dignity and their rights. It is our policy to conduct our business in an honest and ethical manner. We have a zero-tolerance approach to bribery and corruption, including criminal tax evasion, and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

The purpose of this Policy is to set out our responsibilities, and of those working for us, in observing and upholding our way of doing business and provide information and guidance to those working for us on how to recognize and deal with anti-bribery and corruption issues.

### **Who is covered by the Policy?**

This Policy applies to all persons providing services to or working for Bernd Hummel Holding and its subsidiaries, including employees at all levels.

Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for gross misconduct. Any third party who breaches this Policy may have their contract terminated with immediate effect.

### **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. All forms of bribery are strictly prohibited.

### **What is criminal tax evasion?**

Criminal tax evasion is any fraudulent activity that intends to divert funds from any public revenue authority.



## **The Bernd Hummel Holding Anti-Bribery and Corruption Principles**

Anyone providing services to or working for Bernd Hummel Holding and any of its subsidiaries must follow these principles.

You (or someone on your behalf) must not:

- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or with the intention to induce the other party to perform a relevant function improperly.
- 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 or that we will perform the relevant function improperly;
- give or offer any payment to a government official in any country to facilitate or speed up a routine or necessary procedure;
- 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;
- deliberately and dishonestly take action to facilitate, by action or inaction, the evasion of tax by any associated person. This includes third party companies, suppliers, customers, employees etc.

### **Gifts and hospitality**

- This Policy does not prohibit the giving or accepting of reasonable, proportionate and good faith hospitality for legitimate business 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 or for improperly



influencing business decisions (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 or hospitality must not include cash or cash equivalent (such as vouchers) or be given in secret or otherwise concealed.
- Gifts or hospitality must be given in our name, not your name.

### **Raising concerns**

We all have a duty to report instances of actual or suspected wrongdoing, or breach of this Policy. There will be no criticism or reprisal against individuals who raise concerns in good faith.

### **Records**

Bernd Hummel Holding and its subsidiaries must keep accurate financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties and ensure that policies and procedures are being followed.

### **Who is responsible for the Policy?**

The board of directors has overall responsibility for this Policy and for ensuring that the company complies with its legal and ethical obligations relating to anti-bribery.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy.

This policy was last updated January 21, 2021

Julia C. Hummel

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