



Anti-Bribery & Corruption Policy

Scope

This policy applies to everyone working at Marston's.

Statement

Marston's is committed to conducting its operations in a fair and ethical manner, and will not tolerate any form of bribery or corruption from its employees, suppliers or any other parties.

Marston's operates zero-tolerance towards all forms of corruption.

In compliance with the Bribery Act 2010 the Company operates controls and checks over its activities in order to prevent bribery and corruption.

We should all support this commitment; conducting ourselves ethically in support of Marston's reputation. This ethical approach is at the heart of our Ways of Working and our ambition to make Marston's the Place to Be.

Purpose of the policy

This policy sets out Marston's position on bribery and corruption and responsibilities of our employees or agents, including what constitutes bribery and corruption, record keeping and reporting.

The policy applies to all operations within the UK, and abroad. and applies to everyone we have contact with including our employees, suppliers, agencies, government officials, public officials, service providers, advisers, trade bodies, clients and customers and anyone who is seeking an association with the Company.

Responsibilities of our people

To read the terms of this policy.

Inform third party, "associated people" (e.g. agents) who act of Marston's behalf, and ensure they comply with these terms.

Bribery

The criminal definition of bribery involves a financial or other non-financial advantage being offered or received by a person, with the purpose to influence that person to act improperly. It is also a crime for an organisation not to operate a reasonable level of control to prevent bribery. It is an offence under the Bribery Act 2010. The criminal act applies to both the person offering and the person receiving the bribe.

We recognise that Marston's could be held responsible under law for the actions of people associated with the business, particularly our employees and appointed agents.

To avoid any implication of preferential treatment being granted or received by employees in the course of their business activities, the general policy of Marston's is to discourage acceptance of gifts, favours, gratuities or other consideration from UK or overseas suppliers of goods or services or other external parties (including potential suppliers).

The business recognises that at times, gifts and hospitality are received by our employees, where this occurs employees are expected to follow our Corporate Hospitality and Gifts Policy (see below).

Employee: Gifts and Corporate Hospitality

Marston's has a separate Corporate Hospitality and Gifts Policy which sets out the expectation that employees will:

- Remain objective
- Act with integrity
- Be fair
- Avoid conflicts of interest

The policy covers the receipt by employees (and in certain cases their immediate family) of business meals, corporate hospitality and gifts.

The policy does not apply to:

- Business and travel expenses;
- Organised courses, conferences, seminars and workshops paid for by the Group for networking or educational purposes (providing that in all cases such hospitality is open to all, or a fair representation of delegates, or attendees).

It is the Group's policy that employees should:

- Not accept gifts, other than items of very small intrinsic value such as business diaries or calendars or bottles of wine;
- It is up to the line manager's discretion to consider whether all gifts, even small should be disallowed;
- Not accept hospitality which might be deemed by others to have influenced a purchasing decision or to accept hospitality from a competitor of a current supplier;
- Record and report any gifts received or offers of hospitality accepted on the Hospitality Register held on the company portal "Exchange".

Receipt of Corporate Hospitality and Gifts Summary Table:

Type of hospitality/gift received	Record in Register?	Additional comments
Working lunch at third party's office	No	
Out of office meal paid by third party	Yes	Must be "reasonable"
Standard Corporate Hospitality	Yes	
Premium Corporate Hospitality	Yes	Should be avoided
Token gifts	No	
Other gifts >£50 (decline or accept and donate only)	Yes	Record all occurrences

Conflicts of Interest

Employees must avoid any situation where their personal interest conflicts with the interests of the Company, or their judgement may be impaired or compromised.

A conflict of interest can be defined as:

- a) A situation that has the potential to undermine the impartiality of a person because of the possibility of a clash between the person's self-interest and professional or public interest.
- b) A situation in which a party's responsibility to a second party limits its ability to discharge its responsibilities to a third party.

Where an employee is aware of a conflict regarding themselves then they are expected to disclose this to their line manager, or a senior member of the HR department or a senior member of the Internal Audit team. Marston's has a form to assist this process: Conflicts of Interest Annual Declaration. There is an ongoing duty for our employees to disclose conflicts as they arise or change over time.

Facilitation payments

Marston's does not make facilitation payments to secure business. We maintain a zero tolerant attitude to such payments by our employees or agents, including those operating in countries where such payments are legal, illegal, or the laws against them unenforced.

Political parties

The Company holds no political affiliations and makes no political donations.

Documentation

Employees must retain documentation with third parties in order to demonstrate the dealings have been open, fair and honest.

Communication

The policy will be communicated to our directors, senior managers and all employees at a potential risk.

The policy will be made available for all employees to read on the corporate website.

Speak Up

Employees are encouraged to report knowledge they have of any contravention of this policy by other employees to their line manager, or if uncomfortable doing this, using our whistleblowing programme "Speak Up" to anonymously report the matter – contact details are available at:

http://www.marstons.co.uk/docs/governance/2018/whistle-blowing-policy_july18.pdf

Fines for corruption

Any penalty imposed by the **courts upon our employees or any other associated person will not be paid by Marston's.**