

ANTI-BRIBERY AND CORRUPTION POLICY



A CORE GROUP POLICY

Key Points to Remember:

- This policy applies to all colleagues of all Rentokil Initial companies.
- The following actions are prohibited by law and RI policy and may result in disciplinary action, civil or criminal penalties:
 - Giving or receiving anything of value to improperly influence a decision or gain an advantage.
 - Giving or receiving payments to speed up a service or action.
 - Engaging in corruption or inappropriate financial behaviour including giving or receiving gifts or hospitality (whether to suppliers, customer or government officials) to improperly influence decisions.
- Any breach of this Policy may result in severe civil and/or criminal penalties against RI or individuals, and may lead to disciplinary action, which may include termination of employment or third party relationships.
- If you suspect any of these actions occurring, you must report this to Group Legal or via the RI Speak Up process.


Scope and Audience

Rentokil Initial and our group companies (together “**RI**”) are committed to complying with all applicable anti-bribery and corruption laws, in countries where RI operates (together “**Anti-Corruption Laws**”).

This Policy applies to all RI colleagues and contractors working in any capacity and is intended to assist colleagues in spotting potential risks and in making the right decisions.

The Anti-Corruption Laws broadly cover 3 main areas:

1. **Bribery:** Offering or accepting anything of value (e.g. money, gifts or discounts) to influence decisions for personal or business advantage, whether directly or through a third party, even if unsuccessful.

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2. **Corruption:** Abuse of power for personal gain, including acts like embezzlement and bribery.
 3. **Facilitation Payments** (also known as “grease payments” or “back-handers”): Small, unofficial payments to expedite routine actions (e.g. permits and visas).

In certain jurisdictions the above actions are legal or common practice. They are **strictly prohibited by RI** in all circumstances.

What are the risks?

- **Personal Risks:** Violations of Anti-Corruption Laws may lead to serious financial and personal consequences including disciplinary action, significant financial or criminal penalties and imprisonment.
- **Risks to RI:** Breaches of Anti-Corruption Laws may also damage customer and supplier relationships, RI’s reputation and cost RI significant sums in complying with legal or regulatory requirements to investigate accusations.

What is bribery and corruption?

Bribery means giving, offering or accepting anything of value to any person (including a public official) to improperly influence an act or decision to gain business or personal advantage. A bribe could be money, gifts, loans, donations, fees, discounts, commissions, kickbacks, hospitality, services, the award of a contract or any other advantage or benefit.

Bribery can occur directly or indirectly (such as through a third party) and it is irrelevant whether the bribe is accepted or successful in improperly influencing another party or securing an advantage.

Corruption refers to the abuse of entrusted power for personal gain, often involving dishonest or unethical conduct. It encompasses a wide range of behaviours, including bribery, embezzlement and in some instances nepotism/favouritism, where individuals in positions of authority or influence exploit their positions for illicit benefits.

Facilitation payments (also known as “grease payments” or “back-handers”) are typically small, unofficial payments made to secure or expedite a routine or necessary action, such as licensing, permits or processing of government documents, such as visas or customs clearance. These payments are prohibited by RI, even if they are legal or common practice in a particular jurisdiction. This prohibition does not cover legitimate government fees that are required for government services, which will be properly documented and never paid to an individual.

What is permitted and how does RI ensure compliance?

- Hospitality and small gifts may be legitimate activities, as long as they are not excessive and are not intended to have an improper influence.

- Please refer to the local Gifts and Hospitality and Travel Expenses policies referred to in the RI Code of Conduct, as well as any local supplemental policies.
- Please accurately record any gifts, payment or hospitality made to or received from a third party through your local gifts and hospitality register. All accounts, invoices and other records relating to dealings with third parties, including suppliers and customers, must be prepared accurately.

What must be done if a bribe is offered or corrupt activities are revealed or suspected?

- **Report:** Immediately report such activity via the RI Speak Up process or by contacting Group Legal or a member of your local legal team.
- **Seek advice:** If you are unsure whether the activity in question contravenes this policy, seek advice. You can use the RI Speak Up process, contact Group Legal or speak to a member of your local legal team.

YOU MUST:	YOU MUST NOT:
Read, understand and comply with this Policy and the RI Code of Conduct.	Give or offer any payment, gift, hospitality or other benefit (unless permitted by the RI Code of Conduct) in the expectation that a business or personal advantage will be received in return, or to reward any business received.
Report any activities you believe may involve bribery or corruption via the RI Speak Up process or to Group Legal or a member of your local legal team as soon as you become aware of them.	Accept any offer of payment, a gift, or hospitality from a third party (unless permitted by the RI Code of Conduct) that you know or suspect is made with the expectation that RI will provide a business or personal advantage to them or anyone else.
Complete RI's required compliance training.	Give or offer any payment or gift to a government official in any country to facilitate or speed up a routine or necessary procedure.
Carry out appropriate checks on third parties and ensure they agree to comply with our policies applying to third parties (such as this policy, the Sanctions Policy, and the RI Supplier Code of Conduct).	Threaten or retaliate against anyone who has refused to engage in bribery or corruption or who has raised concerns about possible bribery or corruption.
Ensure third party contracts include appropriate obligations relating to anti-bribery and corruption compliance.	Make or accept any facilitation payments of any kind.

Resources / Related Documents

Our RI Code of Conduct offers guidance on a number of subjects which are relevant to this Policy:

- Bribery & Corruption
- Accurate Reporting, Accounts and Records
- Contracts
- Fraud and Money Laundering
- Conflicts of Interest
- Gifts and Hospitality
- Speaking Up via the RI Speak Up process

To report any suspected violations of this Policy, please contact RI Speak Up, Group Legal or a member of your local legal team.

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