

## **WHITBREAD PLC ANTI-BRIBERY POLICY**

### **About this document**

This document is Whitbread's Anti-Bribery Policy. It sets out our position on bribery. It applies to all Whitbread's employees in all markets, and to any person or organisation that works on our behalf.

### **What bribery means**

Bribery is defined by law as offering, promising or giving financial advantage to another person in order to induce or reward the improper performance of that person's function or activity. A bribe involves the promise of money, a gift or a favour to influence someone's behaviour so they don't do their job properly.

### **Whitbread's policy on bribery**

Whitbread is strongly opposed to any form of bribery. It is a personal criminal offence in most countries and can lead to large fines for the company. It can also damage our reputation.

Whitbread does not allow any of its employees to offer or give bribes to any person, including any foreign public official, or any official of another organisation. We also do not allow our employees to ask for or accept bribes.

### **Responsibilities**

It's everyone's responsibility, throughout the Whitbread Group, to prevent, detect and report any instances of bribery. If we identify any instance of bribery, we will make sure the matter is dealt with correctly. This may include reporting the incident, or suspected incident, to the relevant authorities.

### **Communicating this policy**

As well as being set out here, our Anti-Bribery Policy is explained in Whitbread's Global Code Of Conduct. Line managers should make sure all their employees are aware of this policy and know that they have to follow it at all times. Employees should also make their suppliers aware of this policy and ask them to confirm that they understand and accept it.

### **Raising concerns and seeking guidance**

Whitbread's Code Of Conduct contains a 'Speaking Out' section, which explains who employees should contact if they suspect any bribery is taking place, or if they have any doubts about whether something constitutes bribery.