



## **ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

### **1. PURPOSE**

At Demerara Distillers Limited (DDL), business relationships are based on trust, transparency and accountability. The intention of this policy is to ensure that the employees of DDL and its subsidiaries always act professionally and with integrity in all business dealings and to prohibit conduct which amounts to bribery and corruption.

### **2. SCOPE**

This policy applies to all employees of the company while conducting business on behalf of DDL or in any other work related contexts. Our suppliers are expected to support this policy.

### **3. COMMITMENT**

Demerara Distillers Limited is committed to training and enabling employees to recognize when bribery and corruption issues arise; to avoid prohibited conduct where issues are clear and to seek guidance where they are not.

### **4. BRIBERY AND CORRUPT PRACTICES**

- 4.1. Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage, other than those rights and obligations set out in a legally enforceable contract, so to induce or influence an action or decision.
- 4.2. A bribe refers to any inducement, reward, or object/item of value offered to/received by a government employee, public official or employee of a commercial entity in order to gain commercial, contractual, regulatory, or personal advantage.
- 4.3. Bribes often involve monetary payments (or the promise of payments), but can include other benefits or advantages. For example, bribes could include:
  - a. lavish gifts, entertainment or travel expenses, particularly where they are disproportionate, frequent and in excess of contractual obligations;
  - b. cash payments by employees or third persons such as consortium members, introducers or consultants;

- c. the uncompensated use of company services, facilities or property;
- d. loans, loan guarantees or other extensions of credit;
- e. providing a subcontract to a person connected to someone involved in awarding the main contract;
- f. and may also include facilitation payments which are small payments or fees requested by government officials to expedite the performance of routine government action.

#### **5. POLITICAL DONATIONS**

It is the policy of DDL not to make any political donations as an organisation. Employees may choose to make payments from their own money, but not with a view to influence a third party for the benefit of DDL in any way that might give the impression that such influence was intended.

#### **6. CHARITABLE DONATIONS**

DDL believes in contributing to the communities in which it does business and donations to charities are done in keeping with our CSR mandate. However, care should be taken to ensure that such charitable donations are not viewed as an attempt to buy influence for the benefit of DDL or in any other way as being improper. Care should be taken to ensure that charity is legitimate and that any donation is not diverted to other beneficiaries.