



# Anti-Bribery and Corruption Policy



## Introduction

Strauss takes a zero tolerance approach to bribery and corruption

The Strauss Group is committed to the highest standards of bribery and corruption prevention, as part of its values and integrity.

Bribery or corruption, of any kind, in any jurisdiction, regardless of local custom or practice, is strictly prohibited.

### Key principles

Strauss is committed to complying with all applicable laws.

Strauss conducts business honestly, without the use of corrupt practices or acts of bribery. This means that we do not give, offer or receive payments or anything else of value, to any person, for the purpose of influencing or encouraging improper performance or gaining any improper advantage, **including obtaining or retaining business or permits and licenses required for the operation of Strauss.**

Bribery and corruption may take various forms, including improper commissions or royalties, facilitation payments, Gift and Hospitality, rebates or discounts, free goods and more, paid or provided directly or through third parties.

Engaging in bribery or corruption, as well as supporting it indirectly, may lead to dismissal, substantial fines and even to imprisonment.

Gifts and hospitality must be reasonable, proportionate and appropriate in the circumstances. Gifts and hospitality may only be given or received under the rules of the 'Strauss Gift and Hospitality Policy'.

Charitable donations are permitted when they are not given with a corrupt intent; they are fully transparent, recorded and approved under the 'Strauss donations Policy'. Without derogating from the generality of the above, Strauss does not make donations to political individuals or entities.

We must ensure that third parties that provide services to us or act on our behalf do not engage in bribery or in corruption. Therefore, any engagement with a relevant third party is subject to checks and approvals under the 'Strauss Policy for the Prevention of Bribery through Third Parties'.

All our books and accounts must be accurate and reasonably detailed and may not include false, artificial or misleading content.

## Our Anti-Bribery and Corruption Standards

### What are bribery and corruption?

Bribery and corruption go beyond the obvious case of handing over a suitcase full of cash to a government official or a customer to "ease" the winning of a contract or facilitate or secure any kind of business benefit, permit, license etc. It covers a wide range of dishonest interactions in which anything of value is given to a person in order to gain an improper advantage or to encourage inappropriate behaviour. The bribe could be camouflaged as friendly gestures, gifts, free goods, royalties, or consulting fees. The specific benefit sought may include all sorts of financial or other advantages, business opportunities, concessions, contracts, licenses, waivers and more. On many occasions, bribery and corruption are hidden, implicit and carried out by third parties.

### Our core standards

Strauss conducts business honestly, without the use of corrupt practices or acts of bribery.

Strauss will not, directly or indirectly, receive from or provide to any person anything of value for the purpose of gaining or rewarding any advantage reached through improper performance or otherwise to obtain an improper advantage.

## Specific Practices

Generally, the larger the gift and the more expensive and luxurious the hospitality, the more likely it is that they have been given with an improper purpose

### Gift and hospitality

In many markets and cultures providing and receiving gifts and hospitality (such as meals and entertainment) is a common and acceptable way of doing business. Indeed, small gifts and reasonable hospitality are appropriate when given or accepted in good faith and are related to a business activity. However, if those are received or accepted for the purpose of gaining or rewarding any advantage reached through improper performance or to obtain an improper advantage, they are strictly prohibited.

### Our standards

We do not seek to gain any improper advantage through the giving of gifts or hospitality, nor the judgment of our employees should be compromised through receipt of gifts or hospitality. Receiving and giving gifts and hospitality are permitted, provided that they meet all the rules and requirements of the 'Strauss Gift and Hospitality Policy', including the obtaining of approvals when required. Accepting and providing gifts or hospitality that do not meet all rules and requirements is strictly prohibited.

## Facilitation payments

Facilitation payments are small payments made to secure or expedite routine governmental actions. These payments relate, for instance, to situations in which a person applies to obtain something he or she is entitled to from a government authority (for example, a visa, certificate, service, approval, permit or license), but he or she wishes to get it done more quickly than normal and therefore pays the government official to expedite the process. Facilitation payments are often hard to distinguish from a plain bribe.

### Our standards

Strauss prohibits paying facilitation payments.

Whenever you are asked to make a payment on Strauss's behalf, you should be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided.

If you come across a request that you suspect to be a payment to facilitate a routine action, please consult the Strauss Compliance Manager or Chief Legal Officer. Such requests may arise more often in some countries than in others.

## Charitable donations

Anti-bribery and corruption laws do not prohibit charitable donations, but they do prohibit misusing such donations as a way of covering up bribes and other corrupt advantages. A particular risk arises when donations are made to political individuals or entities because in many cases these donations are used as a vehicle to conceal payments made to corruptly influence government officials. Similarly, we are very cautious with approval of donations requested to be made to a third party who has business connections with Strauss.

### Our standards

Strauss does not make contributions or donations to individual, political parties, political, religious or sports organizations.

Charitable donations are permitted provided they meet the criteria and approval requirements of the 'Strauss Donations Policy'.

## Third parties, Intermediaries and other Representatives

Bribery and corruption practices are sometimes carried out by agents, representatives, intermediaries or other associated persons who perform services for or act on behalf of a corporation. Anti-bribery and corruption laws mostly do not distinguish between a company and those acting on its behalf. They expressly prohibit corrupt practices, even when carried out through third parties. This means that we have to be careful and selective when choosing the third parties we do business with. The nature of our relationships with third parties varies significantly. We are committed to investigate the third parties we are engaged with as defined and specified in the Strauss 'Policy on the Prevention of Bribery through Third Parties'. We are also committed to taking action to ensure that the third party's conduct is based on proper ethical standards, and we must ensure that it adheres to this Policy.

### Our standards

The engagement with Third Parties who may expose Strauss to the risks described above, is subject to the investigation and approval process described in the Strauss 'Policy on the Prevention of Bribery through Third Parties'.

A Third Party under the policy is any Government Official or any agent, consultant, or service provider acting on Strauss' behalf (i) in interaction with Government Officials; and/or (ii) to achieve a business purpose, for a success or agency fee.

Any engagement with a Third Party is subject to senior approvals and to enquiries regarding the Third Party in the form of a Due Diligence Questionnaire. Should any red flag arise, the approvers will require additional investigative steps.

A Third Party duly approved under engaged under the policy, will be engaged under a written agreement which includes appropriate Anti-Bribery and Corruption representations and warranties and a reference to the Strauss Code of Ethics.

## Record keeping and Accurate Recording

According to anti-bribery laws, the attempt to include a false record or account consists of an independent violation that is severely punished. As a public company, we attribute paramount importance to applying the strictest standards in ensuring that our records and various reports are reasonably detailed, accurate and credible.

Therefore, all Strauss books, records and accounts must accurately and fairly reflect all transactions and other business engagements. Always escalate to the Strauss Chief Legal Officer when you encounter any suspicious record or suspect an attempt to falsify books and records.

## Compliance

### Risk Assessment

Strauss regularly performs assessments regarding the risks relating to bribery and corruption to which it is exposed.

### Awareness and Training

This Policy is communicated to all employees and relevant partners. Relevant employees and, where appropriate and possible, anyone acting on Strauss' behalf will receive training regarding this Policy and the specific policies specified herein. The training includes both live training sessions and an on-line training program designed to allow participants to become acquainted with anti-corruption legislation and understand the relevant Strauss procedures and the consequences of non-compliance.

### Monitoring and Review

The Strauss Compliance Officer will ensure that this Policy is monitored and reviewed on an annual basis and adapted as applicable and required.

## Results of Breach

This Policy will be rigorously enforced, and Strauss will take disciplinary measures and/or other appropriate action against anyone acting on its behalf who is found to be in breach of any of its terms. Such measures may include termination of employment/engagement.

## Mergers, Acquisitions and Joint Ventures

When purchasing, merging or entering into a joint venture with another company, Strauss may acquire bribery and corruption risks relating to the counter party in the transaction. We therefore maintain an internal procedure that is designed to address these concerns. Before entering into a merger or acquisition deal, contact the legal department and the Strauss Chief Legal Officer for instructions.

## Questions or Concerns?

If you have any questions or concerns regarding this Policy, we urge you to consult your manager or the Strauss Compliance Officer. Additionally, we urge everyone to report to his or her superior or direct manager, the Compliance Officer or Strauss's Chief Legal Officer any concerns and suspicious conduct that may violate this Policy. Anonymous or named reports and complaints may be submitted to our Internal Auditor or to the Strauss Whistleblowing Hotline: <https://report.whistleb.com/en/strauss>

Employees who in good faith genuinely do so will be supported, even if they turn out to be mistaken. Please refer to our Whistleblowing Policy for further details.