

**Subject: Anti-bribery and Gifts & Hospitality policy**

**Introduced: 25 May 2011**

**Revision: 9 February 2026**

**Effective: 21 April 2026**

**1. Introduction and purpose of this policy**

Under the Bribery Act 2010, we will be liable to prosecution if you bribe another person, intending to obtain or retain business or a business advantage for us.

The purpose of this policy is therefore to explain to you what you need to do to help ensure this situation is avoided and that your and our reputations are not damaged.

**2. Words with particular meanings**

In this policy:

- **we, our** or **us** means Young's or any subsidiary company of Young's, as the case may be; and
- **Young's** means Young & Co.'s Brewery, P.L.C.

**3. Individuals to whom this policy applies**

You are required to comply with this policy if you are an individual working for us at any level or grade; it does not matter whether you are temporary or permanent or a contractor.

**4. Bribery: its technical meaning**

Bribery occurs if a financial or other advantage (e.g. gifts or anything of value) is offered or given to induce or reward improper performance of activities connected with a business, trade or profession as well as functions of a public nature. In summary, "improper performance" is performance which amounts to a breach of an expectation that a person will act in good faith, impartially, or in accordance with a position of trust.

Bribery is a criminal act, and the offence is committed by both the giver and receiver. The advantage does not need to be offered or given to the person committing the improper act for there to be an offence.

**5. Zero tolerance to bribery**

We do not tolerate, and we prohibit, any form of bribery, whether it takes place directly or through third parties. This extends to all business dealings and transactions. It is immaterial whether the bribe is intended to benefit us or you or any of your family, friends, associates and acquaintances.

**6. Expected standards of decency**

We expect you to behave at all times honestly, professionally, fairly and with integrity.

**7. New business relationships**

No new business relationship is to be entered into on our behalf without the prior written approval of an executive director of Young's. Where the new business relationship is intended to bind us for longer than 24 months and it is anticipated or expected to involve us making a payment or payments which, in total, exceed £200,000 per annum, or us incurring a liability or liabilities which, in total, exceed £200,000, then you must notify an executive director of Young's of this as soon as possible. There may then be certain things that need to be done before the relationship can be concluded – you may be asked to help with these.

**8. External communication**

External communication will assist in the better implementation of this policy and you are therefore encouraged to refer each contractor and supplier with whom you have contact to the anti-bribery statement appearing on [youngs.co.uk](http://www.youngs.co.uk) (see <http://www.youngs.co.uk/pdf/youngs-anti-bribery.pdf>).

**9. Political donations**

It is against our policy to make political contributions (in the normal meaning of those words) in any form, whether to political parties, causes or to support individual candidates.

**10. Charitable donations**

These may only be made with the written approval of an executive director of Young's.

**11. Facilitation payments**

These are small unofficial payments made to facilitate or speed up routine actions, usually by public officials (e.g. granting licences or permissions). They are bribes and are therefore illegal; they must not be made. If you are asked to make a facilitation payment or suspect any payment requested may be a facilitation payment, you must report the matter to an executive director of Young's or to the company secretary.

**12. Hospitality and gifts – general**

Bona fide hospitality or gifts that seek to improve the image of a commercial organisation and the products and services it provides or that seek to establish cordial relations are recognised as an established and important part of doing business. However, they can still be employed improperly as bribes.

Hospitality includes entertaining, meals, receptions, tickets to entertainment, social or sports events and participation in sporting events.

Gifts include money, goods or services. They are seemingly as a mark of friendship or appreciation and given without the expectation of anything in return.

Hospitality requires the host to be present; if not, the expenditure is a gift.

**13. Hospitality and gifts – do's and don'ts**

Hospitality or gifts must never be solicited, directly or indirectly.

Gifts must not be given without the prior written approval of an executive director of Young's.

Money must never be accepted or given.

Subject to the following, any hospitality or gift to be given or provided by us must comply with the rules or code of conduct of the recipient's organisation – you will need to find out what these are.

You must not accept any hospitality or gift from a third party or provide hospitality or a gift to a third party if:

- it is a bribe or could be interpreted as a bribe (see section 14);
- it could bring you or us into disrepute (see section 14);
- it means there is, or is likely to be, a conflict between the interests of you, a third party and our interests;
- by doing so you will owe a favour to a third party or be under an obligation to them to do, or refrain from doing, something (or a third party will owe you a favour or be under an obligation to you to do, or refrain from doing, something); or
- by doing so you will be prevented from doing your job properly and impartially (or a third party will be prevented from doing his or her job properly and impartially).

A third party includes anyone who is external to us; this includes relatives and individual shareholders and also directors and members of staff when acting in their personal capacity rather than as our representatives.

#### **14. Gifts & Hospitality – approval, reporting and auditing**

***Before accepting*** any gift, hospitality or offer of hospitality from a third party or providing any gift or hospitality on our behalf where in each case, the gift or hospitality:

- (if you are not a director<sup>1</sup> of Young's) has a value of £500 or more; and
- (if you are a director of Young's) has a value of £1,000 or more,

***you must seek the prior approval of your line manager by email and copying [hospitalityandgifts@youngs.co.uk](mailto:hospitalityandgifts@youngs.co.uk), providing the following information:***

- The identity of the third party;
- The value of the gift/hospitality;<sup>2</sup> and
- The date(s) the gift/hospitality is to be received

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<sup>1</sup> *Directors* for this purpose includes executive directors, members of the executive committee or members of the management board.

<sup>2</sup> It may be necessary for you to seek additional information from the third party in order to estimate the value and additional information may be requested from you in that regard.

The line manager confirming or denying approval must also copy [hospitalityandgifts@youngs.co.uk](mailto:hospitalityandgifts@youngs.co.uk).

A register of gifts and hospitality will be maintained by the Company Secretary and reviewed annually by the Head of Internal Audit.

#### **15. Hospitality and gifts – things to consider**

In deciding whether any hospitality or gift could be interpreted as a bribe or could bring you or us into disrepute, you should consider:

- its context: for example, attending or hosting a dinner to celebrate the completion of a deal or project is likely to be less controversial than accepting an invite to the World Cup final from someone tendering on a project;
- whether it has been offered for the right reason: it should be offered as an act of appreciation;
- whether any expectations are being created: expectations should not be created in the giver or anyone connected with the giver, and the hospitality or gift should not have a higher importance attached to it by the giver than the recipient would place on it;
- its value: the value of the hospitality should accord with general business practice in the hospitality and leisure sector and the size of the gift should be small;
- its appropriateness: the nature of the hospitality or gift should be appropriate to the relationship and accord with general business practice;
- the frequency of any hospitality or gift: the receiving of hospitality or gifts should not be overly frequent between the giver and the recipient;
- whether it would accord with stakeholder perception: the nature of the hospitality or gift should not be embarrassing to the giver or the recipient or their respective employers if it became known publicly; and
- whether it is being made openly within the business providing it: if made secretly or undocumented then the purpose is more likely to be open to question.

If, having answered these questions, you are still in doubt about what to do, please refer to section 17.

#### **16. Other policies**

If we have any policies and procedures that impose additional or more stringent requirements than those set out in this policy, they must be followed.

#### **17. Raising concerns**

The prevention, detection and reporting of bribery and corruption is the responsibility of all individuals referred to in section 3. You are encouraged to raise concerns about any behaviour that you believe is contrary to this policy at the earliest possible stage. For further information, please refer to the Whistleblowing policy (number 08/02), a copy of which can be found within the personnel section of the intranet or obtained from the people department within Young's or from the company secretary.

**18. Seeking guidance**

Inevitably, decisions as to what is acceptable may not always be easy. If you are in any doubt as to whether a potential act constitutes bribery, you should discuss this with an executive director of Young's or with the company secretary.

**19. Consequences**

Failure to comply with this policy could subject us and/or our directors and employees (including you) to severe penalties, including fines and imprisonment, and could be very damaging to our business and reputation.

Any individual who fails to follow this policy may be subject to disciplinary proceedings.

**Simon Dodd**  
**Chief Executive Officer**  
**Young & Co.'s Brewery, P.L.C.**