



Policy & Procedure

ANTI-BRIBERY POLICY

HUMAN RESOURCES POLICY –ANTI-BRIBERY POLICY		
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Introduction

Millennium & Copthorne Hotels plc (“M&C”) values its reputation and is committed to trading within the law while maintaining the highest possible ethical standards in all its business activities. It recognises that the risks from bribery are a growing concern of corporate and public life in many countries across the world. M&C, in its ongoing efforts to keep its high ethical standards and with a view to upholding its position against any form of bribery, has prepared and set out a clear policy which should be implemented in conjunction with the company’s Code of Ethics and Business Conduct (“the Code”). This policy should also be read in conjunction with M&C’s policies on Business Hospitality & Gifts.

Purpose and Scope

The purpose of the policy is to set out the responsibilities of Group functions and business units in observing and upholding the company’s position on bribery and applies to all M&C staff worldwide (staff, contract and temporary), within all regions, areas and functions, its agents, consultants and business partners.

Acts of bribery and corruption are illegal and, on conviction, may result in individuals and their employers being subject to criminal sanctions including fines and/or imprisonment.

Policy

M&C prohibits the offering, the giving, the solicitation, requesting or the acceptance of any bribe, whether cash or other inducement:

- *to or from* any person or company, whether they are a public official or public body, or private person or company, wherever situated; or
- *by* any individual employee, agent or other person or body acting on M&C’s behalf; or
- *in order to* gain any commercial, contractual or regulatory advantage for M&C in a way which is unethical: or
- *in order to* gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

For the avoidance of doubt, M&C prohibits

- the making of facilitation payments to government officials (typically used for securing or accelerating routine government procedures); or
- making a payment to any other business contact to secure a commercial advantage; or
- authorising or providing travel benefits, gifts, entertainment, or political contributions for the benefit of a Government Official or other business contact without compliance with the M&C policies on Business Hospitality & Gifts or failing to follow due diligence procedures; or
- entering into a consultant or sales agent agreement or arrangement that will result in contacts with Government Officials or other business contact without conducting due diligence, obtaining the required internal business and legal approvals, retaining all due diligence for eight years, and accurately recording on M&C’s book and records all related payments; or
- making any incomplete, false or inaccurate entries on M&C’s books and records.

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Responsibilities

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the M&C Group. If any instance of bribery is identified, remedial steps will be taken immediately. Managers should ensure all their employees are aware of this policy and their responsibilities to act in accordance with its procedures.

Raising Concerns and Seeking Guidance

If you have any concerns or doubts as to whether a potential act constitutes bribery, please raise those concerns promptly via M&C's Whistle Blowing service, or by sending an email to business.integrity@millenniumhotels.co.uk.

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