

APEX FROZEN FOODS LTD.

Social Accountability Policies

ANTI BRIBERY POLICY

Bribery is a criminal offence. The APEX FROZEN FOODS LTD shall not, pay bribes or offer improper inducements to anyone for any purpose nor does it or will it accept bribes or improper inducements.

To use a third party as a conduit to channel bribes to others is a criminal offence. The APEX FROZEN FOODS LTD does not, and will not, engage indirectly in or otherwise encourage bribery.

The APEX FROZEN FOODS LTD is committed to the prevention, deterrence and detection of bribery. We have zero-tolerance towards bribery. We aim to maintain anti-bribery compliance as business as usual rather than as a one-off exercise.

ANTI-BRIBERY POLICY PROCEDURE:

This policy provides a framework to enable employees and members to understand and implement arrangements enabling compliance. In conjunction with related policies referred to below it will enable employees and members to identify and report a potential breach. We require all staff, including temporary agency staff and all contractors and their employees working on behalf of The APEX FROZEN FOODS LTD and all elected members to:

- act honestly and with integrity at all times and to safeguard The APEX FROZEN FOODS LTD resources for which they are responsible
- Comply with the spirit, as well as the letter, of the laws and regulations in respect of the lawful and responsible conduct of activities.

Scope of this policy

This policy applies to all of the Council's activities. For partners, joint ventures and suppliers, we will seek to promote the adoption of policies consistent with this policy.

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Within The APEX FROZEN FOODS LTD the responsibility to control the risk of bribery occurring rests at all levels. It does not rest solely within assurance and audit functions, but in all business units and corporatee functions and members exercising their Council functions.

This policy covers all staff at all levels and grades, those permanently employed, temporary agency staff, contractors, non-executives, agents, members (including independent members), volunteers and consultants.

The APEX FROZEN FOODS LTD commitment to action This Apex

Frozen Foods commits to:

- Setting out a clear anti-bribery policy and keeping it up to date
- Making all employees and members aware of their responsibilities to adhere strictly to this policy at all times
- Enabling all employees and members to recognise and avoid the use of bribery by themselves and others
- Encouraging its employees and members to be vigilant and to report any suspicious of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- Rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in any resultant prosecution
- Taking firm and vigorous action against any individual(s) involved in bribery
- Providing information to all employees and members on how to report breaches and suspected breaches of this policy
- Including appropriate clauses in contracts to prevent bribery.

Proportional procedures

Procedures to prevent bribery should be proportionate to the bribery risks faced and to the nature, scale and complexity of activities. They are also clear, practical,

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accessible, effectively implemented and enforced. This policy explains the procedures.

Top level commitment

The top-level management has committed to preventing bribery by persons associated with it. They foster a culture within the organization in which bribery is never acceptable. The APEX FROZEN FOODS LTD Team and Management endorse this policy.

Risk Assessment

The Council assesses the nature and extent of its exposure to potential external and internal risks of bribery routinely and as an integral part of its usual procedures. The assessment is periodic, informed and documented. It includes financial risks but also other risks such as reputational damage.

Due diligence

The APEX FROZEN FOODS LTD applies due diligence taking a proportionate and risk based approach in respect of persons who perform or will perform services for or on behalf of the council, in order to mitigate identified bribery risks.

Communication (including training)

The APEX FROZEN FOODS LTD seeks to ensure that its bribery prevention policies and procedures are embedded and understood through communication, including training that is proportionate to the risks it faces.

Monitoring and review

The APEX FROZEN FOODS LTD monitors and reviews procedures designed to prevent bribery by persons associated with it and make improvements where necessary.

The APEX FROZEN FOODS LTD Council is committed to the implementation of

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these principles.

Bribery is not tolerated - The APEX FROZEN FOODS LTD direction to staff and suppliers

- Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
- Give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to ‘facilitate’ or expedite a routine procedure
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by as in return
- retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy
- Engage in activity in breach of this policy.

Facilitation payments

Facilitation payments are not tolerated and are illegal. Facilitation payments are unofficial payments made to public officials in order to secure or expedite actions.

Gifts and hospitality

This policy is not meant to change the requirements of our gifts and hospitality policy. This makes it clear that:

- gifts and hospitality should be declined or returned as a rule
- nominal gifts and hospital up to a financial value of \$25 are acceptable
- Reasonable, proportionate gifts and hospitality made in good faith and that are not

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lavish are acceptable

- All gifts and hospitality must be approved by a senior officer, must be recorded and will be published by the APEX FROZEN FOODS LTD.

Staff and Member responsibilities to avoid or prevent breaches of the policy

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those appointed as members, working for the APEX FROZEN FOODS LTD or under its control. All staff and members are required to avoid activity that breaches this policy.

You must:

- ensure that you read, understand and comply with this policy
- Raise concerns as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. You should speak to your line manager, or, if appropriate to the Head of Internal Audit or to the Monitoring Officer.

As well as the possibility of civil and criminal prosecution, staff that breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

Raising a concern:

This organization is committed to ensuring that all of us have a safe, reliable, and confidential way of reporting any suspicious activity. We want each and every member of staff to know how they can raise concerns. We all have a responsibility to help detect, prevent and report instances of bribery. If you have a concern regarding a suspected instance of bribery or corruption, please speak up — your information and assistance will help. The sooner you act, the sooner it can be resolved.

There are multiple channels to help you raise concerns. Please refer to the Whistle

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blowing Policy and determine your favoured course of action. Preferably the disclosure will be made and resolved internally (e.g. to your head of service). Secondly, where internal disclosure proves in appropriate, concerns can be raised with the regulator (e.g. external auditor). Raising concerns in these ways should always be considered in the first instance rather than making disclosures publicly (e.g. to the media). Concerns can be anonymous. In the event that an incident of bribery, corruption, or wrongdoing is reported, we will act as soon as possible to evaluate the situation. We have clearly defined procedures for investigating fraud, misconduct and non-compliance issues and these will be followed in any investigation of this kind. This is easier and quicker if concerns raised are not anonymous.

Staff who refuse to accept or offer a bribe, or those who raise concerns or report wrongdoing can understandably be worried about the repercussions. We aim to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring nobody suffers detrimental treatment through refusing to take part in bribery or corruption, or because of reporting a concern in good faith.

If you have any questions about these procedures, please contact the Head of Internal Audit or the monitoring Officer. Members with concerns should contact one of these officers.

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