

SUPPLIER ANTI-CORRUPTION AND BRIBERY POLICY

Policy Statement

At Debenhams Group, we are committed to conducting business in an honest and ethical manner. The group is committed to preventing and eliminating bribery across its supply chain. We expect all suppliers to ensure that their operations are free from any form of bribery, corruption, or improper business practices, whether direct or indirect. This policy sets out the principles and practices that all suppliers must adhere to in order to prevent bribery and corruption within our business relationship.

Scope and Purpose

This policy applies to:

(a) All third-party suppliers, contractors, and business partners working with Debenhams Group.

(b) All subcontractors and agents engaged by suppliers.

Suppliers must ensure that their own employees, agents, and subcontractors comply with these principles.

The purpose of this policy is to:

(a) Set out our responsibilities, and of those working with us, in observing and upholding our position on bribery and corruption; and

(b) Provide information and guidance to suppliers working with us on how to recognise and deal with bribery and corruption issues.

What Constitutes is Bribery and Corruption?

For the purposes of this policy, bribery is defined as 'an offer or receipt of any gift, fee, reward or other advantage to or from any person as an inducement to do something in the conduct of Debenhams group business, which is dishonest, illegal or a breach of trust'.

An advantage includes, money, gifts, loans, fees, hospitality, services, discounts, and the award of a contract or anything else of value.

Examples of bribery:

- Offering or accepting kickbacks, bribes, or improper gifts.
- Providing financial or other incentives to influence business decisions.
- Attempting to influence public officials or private sector decision-makers improperly.

Corruption is the abuse of entrusted power or position for private gain which includes:

- Abuse of power for personal or business gain.
- Fraud, embezzlement, or misappropriation of funds.
- Offering or accepting anything of value to gain an unfair advantage.

Supplier Responsibilities

As a supplier to the group, it is not acceptable for you or someone on your behalf to:

(a) 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.

(b) give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;

(c) accept a payment, gift or hospitality from Debenhams group or a third party that you know, or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return;

Gifts and Hospitality

This policy does not prohibit the giving or accepting of reasonable and appropriate gifts and/or hospitality for legitimate purposes:

- They are given or received in good faith and align with customary business practices.
- They do not create an expectation of reciprocation or influence decisions.

Any gifts or hospitality must be pre-approved by Debenhams Group's ethical compliance team.

It is strictly prohibited to give or accept gifts of cash, of any value, to or from public officials, clients or any third party, including Debenhams Group. No cash or gift voucher gifts should be given to Debenhams Group in any circumstances.

Gifts or corporate hospitality should never be offered or given to a public official, including a foreign public official.

Facilitation Payments and Kickbacks

Debenhams Group does not permit facilitation payments or kickbacks of any kind. Suppliers must avoid any activity that could lead to such payments being made or accepted.

Donations

Suppliers must not offer political contributions or charitable donations on behalf of Debenhams Group without prior written approval.

Record-Keeping

Debenhams Group expects suppliers to:

- Comply with all applicable anti-bribery and anti-corruption laws.
- Maintain accurate books and records for all transactions with all third parties, including Debenhams Group.
- Immediately report any suspected bribery, corruption, or unethical conduct to Debenhams Group's ethical compliance team.
- Maintain accurate records of transactions, gifts, hospitality, and due diligence checks.
- Provide documentation upon request for audits or compliance reviews.

Consequences of Breach

Any breach of this policy may result in:

- Immediate suspension of a supplier's account.
- Termination of contracts with Debenhams Group and business relationships.
- Possible legal action or reporting to the relevant authorities.

Reporting Concerns

Suppliers can report concerns via:

- **Email:** EthicalCompliance@debenhamsgroup.com
- **Integrity Line:** (0044) 161 532 4712
- **Web Portal:** [Debenhams Group Portal](#)

Reports will be treated confidentially and without retaliation.

By working with Debenhams Group, you agree to comply with this policy and uphold the highest standards of integrity and transparency.