
Anti-Slavery and Anti-Bribery Policy

Version 3.4

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Introduction

It is our policy to conduct all of our business in an honest and ethical manner. We are a business that acts with integrity and we take a zero-tolerance approach to slavery, trafficking, bribery and corruption in our own organisation and in our supply chain. We are committed to acting fairly and ethically in all of our business activities, including where we partner with other organisations. We are dedicated to implementing and enforcing controls to ensure that all individuals are treated with dignity and respect.

This policy applies to anyone working for Zen or on our behalf in any capacity, including but not limited to our Board of Directors, the Executive Committee, employees, external consultants, interns, agency workers, third party representatives, volunteers, suppliers and business partners. We will not knowingly engage in business or trade with companies that are sanctioned by the UK Government.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect. If you break anti-corruption and bribery laws, you could bring criminal or civil penalties on yourself, Zen or our partners and these can include a fine and imprisonment.

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our management and control comply with it. Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

2. Anti-Slavery and Trafficking

2.1 What is modern slavery?

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited.

2.2 What are we doing to prevent modern slavery?

Our contracting processes include specific prohibitions against the use of forced, compulsory or trafficked labour and we include an expectation that our suppliers will hold their own suppliers to the same high standards.

We expect commitment to the prevention of modern slavery from all organisations with which we do business and will not support or knowingly do business with organisations involved in modern slavery or human trafficking.

We engage with our suppliers on a regular basis to review their practices in preventing modern slavery throughout the supply chain and have introduced an anti-slavery questionnaire in our supplier on-boarding process.

We have created a three-year plan to improve the management and awareness of practices in our business and supply chain and to actively take steps to prevent modern slavery and have formalised roles and responsibilities in our business. We publish an annual modern slavery statement which can be found on our website: [Anti-Slavery | Zen](#).

We include our policy and expectations for detecting and reporting modern slavery in our employee induction program.

We regularly review our policies and procedures with the aim of contributing to progressive improvements to the lives of people in our supply chains and those that are impacted by supply chain decisions.



3. Anti-Bribery and Corruption

3.1 What is Bribery?

Bribery is offering, promising, giving or accepting any financial or other advantage, to influence or reward the recipient or any other person to act improperly in the performance of their functions.

In other words, if you make, authorise, look for, or accept any kind of offer, gift, kickback or payment to get or keep an unfair advantage, that's bribery. It doesn't have to involve money.

All forms of bribery are strictly prohibited. This policy is supported by the Modern Slavery Act 2015 and the Bribery Act of 2010.

Specifically, you must not:

- a) give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- b) accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- c) give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
- d) threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.



3.2 Gifts and Hospitality

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret. Gifts must be given in Zen's name, not an employee's name.

Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.



3.3 Charitable and Political Donations

Bribes can be disguised as charitable donations. For that reason, any charitable donations Zen makes are approved by our Zen in the Community team which selects several charities each year to be supported by Zen. We make donations from money raised via fundraising activities and may choose to support other charities on an ad-hoc basis. Our Zen in the Community team manage these fundraising activities via a fair and transparent process and we publish any fundraising and donations we make on our website.

Zen does not make donations to politicians, political parties or political campaigns and you must not make any political donations which could be taken to be made on behalf of Zen.

4. How to raise a concern

If you suspect that any bribery or corruption has occurred or may occur or if you suspect that an individual or individuals are either involved with, or victims of modern slavery or human trafficking, you must notify Zen as soon as possible by emailing legal@zeninternet.co.uk.

Alternatively you can report it in accordance with our Whistleblowing Policy as soon as possible. You can also contact the government’s Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

5. Document review

This document will be reviewed on an annual basis and will be signed off by Zen’s Board of Directors. We reserve the right to amend this policy at any time.

6. Version History

Version Number	Date	Change	Author	Approved
1.0	30/06/17	Published	S Newton	D McEvoy
2.0	10/10/21	Updated	S Newton	D McEvoy
3.0	10/08/22	Merged the anti-bribery and anti-slavery policies and updated to reflect current business practices	P Wilson	M Kay
3.1	02/12/22	Added relevant legislation	P Wilson	M Kay
3.2	19/05/23	Removed General Counsel as point of contact, changed classification to public, confirmed how external stakeholders should raise concerns	P Wilson	n/a
3.3	25/10/23	Created separate version for external parties	P Wilson	M Kay
3.4	23/09/24	Added that we will not trade with companies sanctioned by the UK Government	P Wilson	M Kay