



Anti-Bribery Policy

Introduction

Think Rugs is committed to conducting business with the highest standards of integrity and ethical behaviour. This Anti-Bribery Policy outlines our stance against bribery, corruption, and unethical practices and serves as a guide for all employees, contractors, agents, and any third parties acting on behalf of Think Rugs. Compliance with this policy is mandatory and failure to comply may result in disciplinary action, including termination and potential legal consequences.

Definition of Bribery

Bribery refers to the offering, giving, receiving, or solicitation of any form of improper advantage, financial or otherwise, to influence the actions, decisions, or behaviour of an individual or organization in a position of trust, to gain or retain business or secure an improper advantage. Bribery can occur in both the public and private sectors and includes facilitation payments, kickbacks, and any form of illegal gratuities.

Prohibited Conduct

a. Bribery: No employee or representative of Think Rugs shall offer, promise, or give anything of value, directly or indirectly, to any person or organization with the intention to improperly influence their actions or decisions.

b. Solicitation: No employee or representative of Think Rugs shall solicit, request, or accept any bribe or improper advantage from any person or organization, whether directly or indirectly, in connection with their duties or business activities.

c. Facilitation Payments: Facilitation payments, also known as "grease payments," are small unofficial payments made to expedite routine governmental actions. Think Rugs prohibits any facilitation payments unless such payments are explicitly permitted under applicable local laws and regulations and have been pre-authorized by the appropriate level of management.

d. Gifts and Hospitality: Employees must exercise caution when giving or receiving gifts, entertainment, or hospitality. No gift, entertainment, or hospitality should be given or received if it creates a real or perceived conflict of interest or is intended to influence a business decision.

e. Political Contributions: Think Rugs prohibits any direct or indirect political contributions, donations, or payments to political parties, candidates, or public officials, unless explicitly authorized and in compliance with applicable laws and regulations.

Due Diligence and Risk Assessment

Think Rugs will implement appropriate due diligence procedures to assess the integrity, reputation, and business practices of our partners, suppliers, agents, and any third parties with whom we engage in business. These procedures may include background checks, financial audits, and compliance certifications.

Training and Communication

Think Rugs will provide regular training programs to employees, contractors, and representatives to ensure their understanding of this Anti-Bribery Policy, applicable laws, and the consequences of non-compliance. Additionally, Think Rugs will communicate this policy to all relevant stakeholders, including suppliers, agents, and third parties.

Compliance and Consequences

Failure to comply with this Anti-Bribery Policy may result in disciplinary action, including termination, and may be subject to legal consequences, including fines and imprisonment. Think Rugs will cooperate fully with law enforcement authorities in any investigations related to bribery or corruption.

Policy Review

This Anti-Bribery Policy will be reviewed periodically to ensure its continued effectiveness and compliance with evolving laws and best practices. Any necessary updates or amendments will be communicated to all relevant stakeholders.

By adhering to this Anti-Bribery Policy, we uphold our commitment to fair and ethical business practices, fostering a culture of integrity within Think Rugs and maintaining the trust of our stakeholders.

Date: 26th June 2023

MD/Management Signature: Sam Tippett

