

ANTI-BRIBERY POLICY

Introduction

Millennium & Cophorne Hotels plc (“M&C”) values its reputation and is committed to 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 (“Code”).

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.

Policy

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

- *to or from* any person or company, whether a public official or public body, or a private person or company, wherever situated; or
- *by* any individual employee, agent or other person or company 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 any payments to public officials for securing or accelerating routine processes and procedures (“Facilitation Payments”).

To further clarify, this policy prohibits the making, giving or receiving of any inducement which results in a personal gain or advantage to the recipient or any person or body associated with the recipient, and which is intended to influence the recipient to take action which may not be solely in the best interests of the company.

Responsibilities

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the M&C Group. If and when any instance of bribery is identified, remedial steps will have to be taken immediately including the reporting of the incident or suspected incident of bribery in accordance with the company’s Whistle Blowing policy.

Managers should ensure all their employees are aware of this policy and of their responsibilities to act in accordance with its procedures.

Raising Concerns and Seeking Guidance

The company’s Whistle Blowing policy provides details of who to contact should you have any concerns or doubts as to whether a potential act constitutes bribery.