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Issue 3

Corporate Policy No: CP1-008

Anti-Bribery and Corruption

Description

The Jaguar Land Rover group of companies (together JLR) is committed to undertake business fairly, with honesty and transparency. This commitment must be reflected in every aspect of our business conduct. The integrity of our personnel, and those with whom we do business, is of paramount importance to our continued success.

It is JLR's policy to comply with all laws, rules and regulations governing anti-bribery and corruption in the territories in which JLR operates. JLR has zero tolerance of acts of bribery and corruption by employees or anyone acting on our behalf. Any breach of this Policy will be regarded as a serious matter by JLR and is likely to result in disciplinary action or dismissal.

This Policy applies to all JLR officers, Directors and employees (collectively JLR personnel), together with agents, sponsors, intermediaries, consultants or any other persons/bodies acting on JLR's behalf.

Statement

No bribes of any sort may be paid to or accepted from customers, suppliers, politicians, government advisors or representatives, private persons or companies.

A bribe is an inducement offered, promised, provided or received in order to obtain an improper advantage. Inducements can take many forms, including cash, extravagant gifts or lavish treatment. Advantages given by inducements can be commercial, contractual or personal.

Under UK law individuals found guilty of bribery can face imprisonment for up to ten years. If JLR is found to have taken part in, or to be lacking adequate procedures to prevent, bribery anywhere in the world, JLR could face an unlimited fine, be excluded from tendering for Government contracts and suffer extensive damage to its reputation.

Facilitation payments ('back-hand' or 'grease' payments) are expressly forbidden. In the event that your safety is threatened, JLR will permit the making of nominal payments; however, personnel must report these payments to their Supervisor / Line Manager, HR representative and the Group Compliance Team and a record of such payment must be made.

JLR is required to keep financial records and to have appropriate internal controls in place in order to evidence the business reason for making payments to third parties. It is expressly prohibited to establish accounts or internal budgets for the purpose of facilitating bribes or influencing transactions ('slush funds').

This Policy does not prohibit the following, provided they are appropriate and properly recorded:

- normal and appropriate entertainment / hospitality (given or received); or
- gifts up to and not exceeding the value of £100 GBP.

JLR recognises that to refuse a gift or hospitality in certain circumstances and / or countries could cause offence to JLR's trading partners. The tests to be applied in all circumstances are that the gift or hospitality:

- must be reasonable; and
- must not be given with the intention of inappropriately influencing the recipient.

Please refer to [Corporate Policy CP1-009 'Gifts and Hospitality'](#) for further information.

If you become aware of an activity or conduct that you suspect is bribery or corruption you have a duty to report this.

To report a concern (in confidence) or to seek further guidance on the application of this Policy, please refer to:

- JLR Group Compliance via group.compliance@jaguarlandrover.com; or
- the JLR Code of Conduct, which can be found at <http://www.jaguarlandrover.com>.

All Jaguar Land Rover corporate policies, including all corporate and operational policies are subject to certification (as a part of the annual review process) and independent internal audit.

*Compliance with all company policies is mandatory, in accordance with the specified scope and application.
Non-compliance is subject to disciplinary action.
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