



## Anti Bribery & Gifting Policy

1<sup>st</sup> May 2024

Since 2005, Elite has focused on serving our customers, associates, investors, franchisees, suppliers and the communities where we do business. Guided by our core beliefs and values as laid out in our “Who We Are” statement, Elite’s commitments to integrity and social responsibility extend to its worldwide supply base.

Integrity in our Supply Chain is critical to the overall success of Elite Services Holdings and to your success as a partner.

We would like to take this opportunity to remind you of Elite’s policy with respect to gifts and other business courtesies:

***Suppliers must not offer or give any payments, fees, loans, services or gifts to any Elite associate as a condition or result of doing business with Elite. Elite’s policy does not prohibit gifts of nominal value (under £50). Normal business meals and entertainment (such as attendance at sporting or cultural events), as well as similar customary and reasonable expenditures to promote general business goodwill, are acceptable even if their value exceeds £50, so long as the associate is accompanied by the host.***

***The Supplier Code of Business Conduct should be reviewed from time to time for your own benefit. Suppliers are expected to report any potential solicitation of a kickback from any Elite associate to Elites Managing Director, 19 Webb Ellis Business Pk, Rugby, CV21 2NP***

Gift giving by suppliers, though most often well-intentioned, nonetheless tends to create awkward situations for Elite rather than fostering goodwill in the relationship. I therefore recommend that Elite suppliers refrain from giving any gifts to Elite associates.

Gareth Lewis  
Service Director