

ASDA'S ANTI-CORRUPTION POLICY

Version: 1.1 (19.04.2021)

Asda Stores Limited, its subsidiaries, affiliates and charitable foundation (collectively known as "**ASDA**"), are committed to maintaining the highest possible ethical standards and complying with all applicable laws. In all its operations, ASDA seeks to avoid even the appearance of impropriety with respect to the actions of any of its officers, directors, colleagues, employees, agents or representatives. This anti-corruption policy ("**Anti-Corruption Policy**") prohibits corrupt payments in all circumstances, whether in dealings with government officials or individuals in the private sector.

General Directives

It is ASDA's policy to comply with all relevant anti-corruption laws including, but not limited to, the Bribery Act 2010.

Accordingly, ASDA prohibits anyone acting on its behalf, directly or indirectly, from making or receiving improper payments.

Improper payments means receiving or paying bribes or giving, offering, or promising to give money or anything else of value to any person, including any Government Official, in order to improperly influence any act or decision of a person, or to otherwise gain an improper benefit for ASDA.

A Government Official includes, but is not limited to, any officer or employee of a government entity, any person acting in an official capacity for or on behalf of a government entity and any candidate for a public office position or any person acting in an official capacity for or on behalf of the candidate.

The use of ASDA funds or assets for any illegal, improper or unethical purpose is strictly prohibited.

Compliance with this Anti-Corruption Policy is required of all colleagues and third parties when they are acting on behalf of ASDA. All colleagues are responsible for ensuring that third parties who act on ASDA's behalf fully understand and follow this Anti-Corruption Policy and associated procedures.

Breaches

Any colleague or third party who breaches this Anti-Corruption Policy in connection with ASDA business will be subject to disciplinary measures, up to and including dismissal in the case of a colleague, or termination of business relations in the case of a third party and, where appropriate, referral of the matter to relevant law enforcement authorities.

Implementation of Anti-Corruption Programme

To effectively implement this Anti-Corruption Policy, ASDA shall maintain an effective risk-based anti-corruption programme (the "**Programme**") designed to prevent, detect, and remediate bribery and recordkeeping breaches. As part of the Programme, ASDA shall adopt operating procedures specifically targeted to the corruption risks that exist for all its operations, worldwide. Management in each affected area shall be responsible for ensuring that adequate resources are devoted to maintaining effective compliance programmes. A senior executive at ASDA shall be given overall responsibility for the Programme, and shall report regularly to the Compliance, Ethics, Risk and Audit Committee which shall exercise reasonable oversight as to the implementation and effectiveness of the Programme.

The procedures and governance used to implement this Anti-Corruption Policy, shall include, at a minimum:

- effective controls on the disbursement of funds and other assets to ensure that disbursements are not made for improper purposes;
- measures to ensure that books and records accurately reflect the disposition of assets;
- clearly articulated standards of behaviour as included in ASDA's Statement of Ethics, which shall be well publicised to all of ASDA's operations, worldwide;
- clearly defined roles, responsibilities and reporting lines for day-to-day management and implementation of the compliance procedures;
- effective training of executives, colleagues and, where appropriate, third parties regarding relevant anti-corruption standards and procedures;
- testing by internal audit or a third party for compliance with the anti-corruption procedures, including review of expenditures for operations that interact with government officials;
- corruption risk assessments conducted annually;
- conducting due diligence of Third Party Intermediaries (as defined in ASDA's Anti-Corruption Compliance Procedures);

- effectively publicised means to report or seek guidance on actual or potential anti-corruption issues, as well as procedures for responding to such reports or requests;
- regular review and, if necessary, revisions or updates to this Anti-Corruption Policy and the associated procedures where appropriate, including in response to legal, regulatory, or industry changes or breaches of the Anti-Corruption Policy;
- appropriate incentives and punishments for colleagues, executives and third parties for adherence to or breaches of, respectively, this Anti-Corruption Policy and the associated procedures.

Reporting

Every colleague or third party who has information that this Anti-Corruption Policy or the associated procedures may have been breached, or believes he or she is being asked to pay a bribe or receive a bribe, or otherwise act in contravention of this Anti-Corruption Policy shall immediately report the event.

ASDA has an Ethics helpline, which is available to colleagues around the world 24 hours a day, seven days a week. The helpline is staffed by an independent organisation, and to the extent possible callers may remain anonymous.

To report a breach or suspected breach of this Anti-Corruption Policy or the associated procedures, contact ASDA Ethics:

0800 318 405
ethics@asda.co.uk

Anyone who reports a suspected breach of this Anti-Corruption Policy will not be subject to disciplinary action or retaliation for the act of making the report. However, anyone who reports a suspected breach may be subject to disciplinary action to the extent he or she breached any ASDA policy or procedure.

This information does not create an express or implied contract of employment or any other contractual commitment. ASDA may modify this information at its sole discretion without notice, at any time, consistent with applicable law.