

Anti-Bribery and Corruption

Our Principle

HOERBIGER conducts all business with integrity and transparency. We oppose bribery and corruption.

Policy

HOERBIGER complies with all laws and regulations governing anti-bribery and corruption in the jurisdictions in which we operate.

No bribes or facilitation payments shall be given to, or accepted from, business partners or their associates. This includes customers, suppliers, politicians, government employees, advisors or representatives, companies, or private persons.

Definitions

A bribe is anything of value offered, promised, given or received in order to obtain an improper advantage. Bribes can take many forms, including cash, gifts, or other extraordinary treatment. Bribes or improper advantages must not be given to the company, individuals or to third parties – in all cases bribes are improper and must be rejected.

Facilitation payments (sometimes also called ‘backhanders’ or ‘grease’ payments) are bribes to obtain or expedite services to which the company is actually entitled to (e.g., customs clearance). In many jurisdictions, facilitation payments are regarded as bribes and are illegal. HOERBIGER prohibits facilitation payments.

This policy does not prohibit normal entertainment and hospitality (given or received) which meets the criteria of the HOERBIGER Gift and Hospitality Policy.

Record-keeping

All payments shall be accurately and truthfully recorded. It is prohibited to establish accounts or internal budgets for the purpose of bribe payments or influencing transactions (so-called “slush funds”). It is also prohibited to use third parties to make or receive bribes.

Information on penalties and fines

In many jurisdictions bribery and corruption in government and the private sector are crimes and are subject to severe punishment. For example, the company can be fined and excluded from concluding future public or private contracts. Individuals found guilty of bribery and corruption may be fined or imprisoned.