

# Anti-bribery and Corruption Policy

1 June 2022



**Westland Milk Products**  
Hokitika · New Zealand

*Nourishment made beautifully*

## Westland Milk Products – Anti-bribery and Corruption Policy

Westland Milk Products, a member of the Yili Group, is committed to ensuring that we conduct our relationships with our suppliers and customers in a fair, legally compliant and open manner.

In addition to compliance with current New Zealand anti-bribery and corruption laws, we are committed to upholding the principles of respect, honesty and integrity. We aim to treat all stakeholders fairly and impartially without discrimination. It is Westland's policy to engage only with suppliers and customers who share these values.

By supplying goods or services to us, or buying goods from us, you agree to work collaboratively with us to further our goals in this regard and agree that our business relationship will be conducted in accordance with the following principles:

1. **Merit only** - We will engage with each other based on merit only, aiming to promote competition for the long-term benefit of our businesses and consumers.
2. **Avoid bribery or perceptions thereof** - We will, and we require all Westland suppliers to avoid any conduct which is based upon or could be interpreted as showing undue or improper influence or could be mistaken for bribery or corrupt activity. By example this conduct could include:
  - (a) Offering to do, provide or withhold something, in exchange for the other party doing, providing or withholding something, where such exchange would otherwise be considered unusual, unreasonable or not at arms' length in the ordinary course of business exchange; or
  - (a) Engaging in unethical or threatening behaviour.
3. **Gift policy** - Our employees, contractors or agents may not accept, nor may they seek gifts from another party, including entertainment, physical goods or money. Exceptions to this are where: the gift is of a nominal value; an event is for the benefit of several customers or suppliers and not Westland alone; it involves reasonable food and beverage consumption shared during conduct of business; commemorative gifts or networking, which is conducted as part of the ordinary course of business, provided the gift does not appear to be unreasonable, or likely to cause undue influence. Any commemorative gifts will be made to the company, not individual employees. Employees are required to disclose their receipt or offers of gifts.
4. **Transparency** - Meetings between parties will be appropriately arranged, conducted in an open setting, be transparent and a record should be maintained where appropriate.
5. **Avoid conflicts of interest** - Westland requires that all suppliers declare any outside interests that could conflict with, have the potential to conflict with, or be perceived to conflict with the interests of Westland.
6. **Application of policy** - Suppliers will ensure this policy is communicated to all employees, contractors or agents that interact with Westland, and suppliers will use best endeavours to ensure this policy is complied with by them.
7. **Breach is serious** - If there is any breach of these principles, that breach must be notified to the other party as soon as is practicable. A breach of these principles will be considered by Westland as a material breach of the terms of any affected contract, terms of trade or terms of purchase, and of the employment agreement of employees involved. Strict consequences, including reporting to the relevant New Zealand authorities and appropriate remedies will follow accordingly.

### Reporting Channel:

Any suspected anti-bribery or corruption behaviours or practices can be reported to Yili Group as follows:

**Hotline:** +86-010-58640388

**Email:** [yilicompliance@yili.com](mailto:yilicompliance@yili.com)

All reports will be treated as strictly confidential.