



PizzaExpress Group Anti-Bribery and Corruption Statement 2020

PizzaExpress Group Limited (“PizzaExpress”) is committed to conducting all of its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK in respect of our conduct both at home and abroad. Therefore, we take our legal responsibilities very seriously.

As part of our commitment, we have identified particular risks for our business when working in the UK and abroad. To address those risks, we have an Anti-Bribery and Corruption Policy (“the Policy”) that is dedicated to ensuring all employees are aware of it and receiving training where appropriate.

The purpose of the Policy is to:

- set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

The Policy applies to all individuals working at all levels, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as “workers”).

Furthermore, the Policy also applies to all companies within the group, including associated persons and organisations. It applies throughout the world including restaurants currently in the UK, China, Hong Kong, Singapore, UAE and in any other territory that PizzaExpress hold a Franchise Partnership.

PizzaExpress is committed to ensuring that the Policy is circulated and made known to all individuals concerned.

The Compliance Manager (currently the Chief Financial Officer – “CFO”), has primary and day-to-day responsibility for implementing the Policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are



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responsible for ensuring those reporting to them are made aware of and understand the Policy and are given adequate and regular training on it.

The Compliance Manager monitors the effectiveness and reviews the implementation of the Policy, quarterly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

Awareness of the Policy forms part of the induction process for all new workers. Where appropriate, existing workers receive training on how to implement and adhere to the Policy.

All workers are responsible for the success of the Policy and should ensure they use it to inform us of any suspected danger or wrongdoing.

The PizzaExpress zero-tolerance approach to bribery and corruption is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter. In particular, new written contracts and agreements with third parties state the Company's approach to this area.

The PizzaExpress Board of Directors have overall responsibility for ensuring the Policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Signed

A handwritten signature in black ink, appearing to read "Jinlong Wang", written over a horizontal line.

Jinlong Wang

CEO and Chairman, PizzaExpress Group Holdings Limited

Date: March 2020
