



2024

Anti-Bribery & Anti-Corruption Policy



Damian Deal (Director)
Vanquish Insulations UK Ltd
01/08/2024

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

It is Vanquish Insulations UK Ltd's policy to conduct all our 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 and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption however we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

PURPOSE OF THIS POLICY

The purpose of this policy to:

- a) Set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- b) Provide information and guidance to those working for us on how to recognize and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years imprisonment and if Vanquish Insulation UK Ltd is found to have taken part in corruption the Company could face an unlimited fine, be excluded from tendering for public contracts, and face damage to our reputation. We therefore take our legal responsibilities very seriously.

In this policy, third party means any individual or organisation you encounter during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

WHO IS COVERED BY THIS POLICY

This policy applies to all individuals working at all levels, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, sponsors, agents or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as workers in this policy).

WHAT IS BRIBERY

A bribe is an inducement or reward offered, promised or provided to gain any commercial, contractual, regulatory or personal advantage. It is not restricted to monetary transactions.

GIFTS AND HOSPITALITY

This policy does not prohibit normal and appropriate hospitality given and received to or from third parties.

The giving or receipt of gifts or hospitality is acceptable, if the following requirements are met:

- a) It is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits.

- b) It complies with local law.
- c) It does not include cash or a cash equivalent (such as gift certificates or vouchers).
- d) Taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time.
- e) It is given openly, not secretly.
- f) It is in accordance with and reported in line with Gifts and Hospitality Policy.

WHAT IS NOT ACCEPTABLE?

It is not acceptable for you (or someone on your behalf) to:

- a) Give or promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business or personal advantage will be received, or to reward a business or personal advantage already given.
- b) Give, or promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.
- c) Accept a gift, hospitality or payment from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business or personal advantage for them.
- d) Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy.
- e) Engage in any activity that might lead to a breach of this policy.

POLICY APPROVED

Damian Deal (Director)
01/08/2024