

Visually Connected Worldwide (VCW) Anti-Corruption and Bribery Policy Statement

1. Policy Statement

1.1 It is VCW's policy to conduct all our business in an honest and ethical manner. VCW 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 VCW operate and implementing and enforcing effective systems to counter bribery.

1.2 VCW will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which VCW operate. However, VCW remains bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

1.3 Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if VCW is found to have taken part in corruption, VCW could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. VCW therefore take its legal responsibilities very seriously.

1.4 The purpose of this policy is to publicly communicate to third parties the company's position on bribery and corruption. Workers should refer to our internal policy

1.5 In this policy, third party means any individual or organisation that comes into contact with VCW, 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.

2. Who is covered by the policy?

This policy applies to:

(a) all individuals working at all levels and grades, including partners, senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, 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); and

(b) Third parties. Where VCW engage with third parties, VCW will undertake appropriate steps to ensure that they comply with the principles set out in this policy.

3. What are bribery and corruption?

In order to gain any commercial, contractual, regulatory or personal advantage. Corruption is the misuse of office or power for private gain.

A bribe is an inducement or reward offered, promised or provided

4. What is not acceptable?

VCW does not (nor do we procure someone) to:

- (a) give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- (b) give, 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 payment from a third party that we know, or suspect is offered with the expectation that it will obtain a business advantage for them;
- (d) accept a gift or hospitality from a third party if we know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- (e) threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- (f) engage in any activity that might lead to a breach of this policy.

6. Facilitation payments and kickbacks

6.1 VCW does not make, and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official.

6.2 Kickbacks are typically payments made in return for a business favour or advantage. VCW avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by the company.

7. Donations

VCW does not make contributions to political parties. VCW only make charitable donations that are legal and ethical under local laws and practices.

8. How to raise a concern

Third parties are encouraged to raise with VCW concerns about any issue or suspicion of malpractice at the earliest possible stage. Any concerns or issues should be referred to one of the company directors.

9. Monitoring and review

VCW will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness.