

ANTI-BRIBERY POLICY

General Statement

V.J. Donegan & Co Ltd are committed to the highest standards of corporate behaviour. This is reflected in our Company Values which include the value of "demonstrable professional and ethical integrity".

A fraudulent or corrupt act can impact on confidence in the Company and damage both its reputation and image. This effect may often exceed the significance or value of the act itself.

Our Board of Directors has overall responsibility for ensuring this policy complies with its legal and ethical obligations, and that both directors and employees comply with it.

Definitions

What is Bribery?

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber.

Standard of Behaviour

The purpose of this policy is to:-

1. set out V.J. Donegan's responsibilities, and those of all employees and directors, in observing and upholding our position on bribery and corruption; and
2. provide information and guidance to those working for the Group on how to recognise and deal with bribery and corruption issues.

V.J. Donegan takes a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and when implementing and enforcing effective systems to counter bribery.

V.J. Donegan prohibits offering, giving, soliciting or accepting any bribe, whether cash or other inducement:

- to or from any person or company, whether a public official or public body, or a private person or company, wherever situated; or
- by any individual employee, agent or other person or company acting on V.J. Donegan's behalf; or
- in order to gain any commercial, contractual or regulatory advantage for V.J. Donegan in a way that can be deemed to be unethical; or
- in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

V.J. Donegan prohibits the making of payments to public officials for securing or accelerating routine processes and procedures. Such payments are known as 'Facilitation Payments'.

This policy prohibits the making, giving or receiving of any inducement which results in a personal gain or advantage to the recipient or any person or body associated with the recipient, and which is intended to influence the recipient to take or refrain from taking any action which is inconsistent with the proper performance of their responsibilities.

Gifts and Hospitality

This policy does not prohibit normal and appropriate hospitality. Subject to the note below, a record of hospitality and gifts accepted or offered must be kept. The record will be subject to managerial review and prior approval where appropriate. Key policy elements are:

- The acceptance or offer of small/minimal value gifts and any branded gifts intended for multiple circulation, like V.J. Donegan branded promotional goods and/or casual hospitality, such as business lunches or invitations to a general function such as a seminar, breakfast briefing or drinks reception, which is clearly open to a wide audience outside of the business, is acceptable so long as they are in the context of a normal and appropriate business relationship and proportionate to that business relationship. These aforementioned items do NOT need prior approval from the Company Secretary or to be recorded.
- any hospitality or gifts offered to a specific individual, and not covered by the previous paragraph must be recorded by that individual.
- Any hospitality or gift which could influence or appear to influence decisions made by or on behalf of V.J. Donegan should be refused but should still be recorded.
- Offering or accepting a gift or hospitality which creates or appears to create a conflict of interest for those involved is unacceptable. If there is any doubt about the propriety of accepting a gift or hospitality, it should be refused, but should be recorded and also reported verbally to the Company Secretary.
- Primary responsibility for deciding whether gifts or hospitality should be accepted lies with the individual.
- Any invitation which is directed personally to an individual and involves individual or selective hospitality will need line-manager approval and to be recorded.
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Responsibilities of V.J. Donegan Employees

- Individual members of staff are responsible for ensuring that a record of gifts and hospitality offered and/or received is made.
- If any member of staff is concerned about any actions, they should contact the Company Secretary for guidance or advice.
- Directors are responsible for ensuring that all their employees are aware of this policy, and fully understand the rules in relation to the acceptance of gifts and hospitality.

Dealing with Bribery

Any employee who is concerned that he or she is potentially being bribed should report this matter to the Company Secretary immediately.

If an employee is concerned that acts of bribery are occurring within the organisation, they should inform their line-manager in the first instance. If this course of action is inappropriate, the employee should inform another senior manager.

Donations to Organisations

V.J. Donegan makes regular donations to its chosen charities with the prior approval of board members. No employee should make donations to a charity or other organisation on behalf of V.J. Donegan in any other way. Personal donations are, of course, at the discretion of the individual subject to the following clarification.

It should be noted that no donations should be made to charities, political parties or other organisations with the intention of gaining a business advantage.

Disciplinary Action

Any employee found to have offered or accepted a bribe will face disciplinary action which could include dismissal for gross misconduct.

It should be noted that bribery and corruption are punishable for individuals by up to ten years' imprisonment, and if V.J. Donegan is found to have taken part in any acts of bribery or corruption, it could face an unlimited fine, be excluded from tendering for public contracts and face damage to its reputation.

The Company is obligated following any instances of non-compliance, to work with the regulatory authorities and public sector bodies including; the Department of Health, JobCentrePlus and the Pensions Service, the Police, Her Majesty's Revenue and Customs, Immigration Service, and the National Crime Agency for the purposes of preventing, detecting and investigating crime.

Signed:



V J Donegan

Position:

Managing Director

Date:

January 2021

