

## POLICY

# Anti-bribery and fraud policy (CP.003)

**VGC Value** – “We achieve potential” - Expertise and ethics underpin our business

### Vision

The VGC Group and its associated companies operate an ethical and open approach to the way we do business. Fraud, bribery, and corruption do not align with our business values and are unacceptable in our work environment. We do not tolerate any form of unethical or inappropriate behaviour including acts of corruption, fraud, bribery or unfair anti-competitive business practices.

### Strategy

This policy applies to all employees and associated persons including officers of the company, temporary workers, consultants, contractors, agents, and subsidiaries acting for, or on behalf of, the company. While working on behalf of the VGC Group everyone shall maintain the highest standards of business conduct, pursue our business interests with the highest degree of integrity and act to safeguard the resources and assets of the Group.

A bribe is defined in the Bribery Act 2010 as “a financial or other advantage” offered, promised, or given to induce a person to perform a relevant function or activity improperly, or to reward them for doing so. This could include, but is not limited to a gift, reward, entertainment, or incentive.

The following will be adhered to when working for/or on behalf of VGC Group:

- You shall not accept, directly or indirectly, any gift, inducement, or incentive during the course of your duties.

- If you are offered any incentive, you must inform the chief operating officer who will review the offer and decide whether it is appropriate. All items offered will be recorded on a register which will be reviewed on a regular basis. All offers are deemed to belong to the company. The company will decide whether you are permitted to avail yourself of any opportunity
- You are required to take particular care to ensure that all organisation records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers, and public officials.
- You shall not offer whether directly or indirectly any bribe or incentive during your duties.
- You should notify the chief operating officer should you become aware of any colleague or third party who has offered or received a bribe or incentive, or report using our whistleblowing form on the company website. The organisation will ensure that the individual is not subjected to detrimental treatment because of their report.
- You should obtain prior approval from your line manager of all gifts or entertainment provided to others. You will need to provide the receipts thereof to the accounts department. All gifts or entertainment provided by the company will be approved by a director and recorded on the company gift register.

Fraud is an ever-present threat and must be a concern to all members of staff and persons employed in a similar capacity. Fraud may occur internally or externally and may be perpetrated by staff, consultants, suppliers or contractors, individually or in collusion with others. It is relevant to note that incidence of fraud traditionally rises in times of recession and significant change.

The most recent piece of fraud related legislation in the UK is the Fraud Act 2006. In addition to the existing common law offence of conspiracy to defraud, the Fraud Act 2006 provides for a general offence of fraud with three ways of committing it. These are:

- Fraud by false representation
- Fraud by failing to disclose information
- Fraud by abuse of position

HM Treasury include the following in their definition of fraud: theft, false accounting, bribery and corruption, deception, and collusion.

Fraud risk can best be managed through preventative and detective control measures. The Group is committed to the continuous improvement of fraud prevention and detection techniques. The Board already has procedures in place that reduce the likelihood of fraud occurring. These include documented procedures and systems of internal control and risk assessment. Examples of how the Group manage fraud risk are:

- Defining, setting, and maintaining control procedures to identify and deter fraud
- Investigating all incidences of actual, attempted, or suspected fraud
- Encouraging staff to be vigilant and raising fraud-awareness at all levels
- Ensuring key internal controls are complied with
- Providing staff with effective confidential reporting mechanisms and encouraging their use
- Acting against individuals and organisations perpetrating fraud against the group and seeking restitution of any asset fraudulently obtained and the recovery of costs
- Co-operating with the police and other appropriate authorities in the investigation and prosecution of those suspected of fraud.

VGC departmental managers must ensure that appropriate information and training is provided to their teams and only the approved supply chain is engaged, who have been through the supplier approval process. Failure to comply with this policy is a serious matter. Any suspicion of fraud, theft or other irregularity should be reported, as a matter of urgency, to your line manager. If such action would be inappropriate, your concerns should be reported upwards to a member of the senior leadership team.

It is important that all staff can report their concerns without fear of reprisal or victimisation and are aware of the means to do so. The Public Interest Disclosure Act 1998 (the "Whistle-blowers Act") provides appropriate protection for those who voice genuine and legitimate concerns through the proper channels. See the separate Whistle Blowing Policy for further details.

A criminal offence will be committed under the Bribery Act 2010 if an employee or associated person offers, promises, gives, requests, receives or agrees to receive bribes or offers, promises, or gives a bribe to a public official with the intention of influencing that official in the performance of his/her duties. Where there are allegations of inappropriate actions or fraud, the circumstances will be fully investigated. Any breach of this policy is likely to constitute a serious disciplinary, contractual, and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the organisation. Where appropriate the offence will be reported to the police or other statutory body.

**Signed**


**Dated: 3 March 2025**



Ciara Pryce  
Chief Executive Officer

*This policy confirms the commitments of all members of the VGC Group.*

## Related Information



KNOWLEDGE

### Expenses and entertainment...

21 March 2025