

## **Anti-Bribery & Corruption Policy**

This policy aims to reduce our potential exposure to corrupt practices by formalising our commitment to maintaining business integrity and values. This policy applies to everyone involved in the business.

We aim to conduct our business with honesty and integrity at all times and will not participate in activities designed to provide an 'unfair' advantage to our company. We do not offer or receive any form of unethical incentives or payment.

## Van Walt Ltd prohibits:

- The offering, giving or acceptance of any bribe, whether money or other, to or from any person or company.
- Any employee acting on Van Walt's behalf in order to gain any commercial, contractual or regulatory advantage for Van Walt Ltd in a manner which is unethical
- Or in order to gain any personal advantage, financial or otherwise, for the individual or anyone connected with that individual.

To achieve our policy, we are committed to:

- Communicating this policy to employees and other affected parties
- Training all Van Walt employees to recognise and report any corrupt practices undertaken by themselves or others.
- Handling information received with sensitivity and confidentiality
- Investigating all allegations of fraud, bribery and other corrupt practices
- Immediately informing the police and relevant authorities where a crime may have been committed
- Co-operating fully with officials during any investigations or legal proceedings
- Taking swift action against anyone confirmed as being involved in corrupt practices
- Implementing disciplinary procedures concerning anyone in breach of this policy

Preventing, identifying and reporting of bribery is the responsibility of everyone working for, or on behalf of, Van Walt Ltd. All staff must therefore:

- Act with honestly and integrity at all times
- Respect our customers, suppliers and any other parties with whom Van Walt interacts, in order to achieve our objective of conducting business in an ethical, lawful and professional manner.
- Comply with laws and regulations of all countries in which Van Walt Ltd operates.

Van Walt Ltd will apply a 'zero tolerance' approach to acts of bribery and corruption. Any breach of this policy will be regarded as a serious matter and is likely to result in disciplinary action.

Where it is confirmed or suspected that an external third party is guilty of bribing or attempting to bribe our employees, suppliers or customers they will be informed in writing that any business dealings with them will be ceased immediately and the appropriate authorities will be informed.

Vincent Van Walt Managing Director

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