



## VITAL ENERGI UTILITIES LIMITED ANTI-BRIBERY & CORRUPTION POLICY SIGNED STATEMENT

Vital Energi takes a zero-tolerance approach to bribery and corruption of all kinds. This reflects the core values of the business to promote openness and transparency and to seek the highest professional standards across its different areas of activities. Vital Energi is committed to ensuring that it and all employees, partners, agents and supply chain or any persons or companies performing services for or on behalf of Vital Energi abide by the highest ethical standards. The Board of Directors and Senior Management are committed to implementing and enforcing effective systems to prevent and eliminate bribery, in accordance with the UK Bribery Act 2010 (the "Act") which came into force on 1 July 2011.

Because of its diversification and the size and complexity of many of its tenders and contracts Vital Energi may be, although extremely unlikely, exposed to situations which would bring it in conflict with the Act and as such intends that all employed by Vital Energi:

### WILL:

- Behave honestly, fairly, be trustworthy and uphold the integrity of themselves and the organisation.
- Treat others with respect.
- Comply with the rules, policies and procedures such that there is no conflict with the Act.
- Use the resources of the organisation in the best interests of Vital Energi and avoid possible conflicts of interest, declaring them to higher management where appropriate.
- Not pay, request or accept bribes in any form.
- Make clear distinctions between the interests of the organisation and their own ensuring that any action that they take will not leave Vital Energi exposed to influence from a third party.
- Not accept gifts, invitations or other advantages other than of a pecuniary nature which may affect their decisions regarding a third party.
- Ensure that they comply with all current legislations and in particular the Act referred to in this policy.
- Report incidents, risks and issues which deviate from our policies.

**BREACH:** A breach of these Policies by an employee will be treated as grounds for disciplinary action. Employees and other individuals acting for, or on behalf of, Vital Energi should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for Vital Energi.

**SUCCESS:** The success of Vital Energi's anti-bribery and corruption measures depends on all employees of Vital Energi, playing their part in helping to prevent bribery.

Vital Energi actively encourages employees and those acting for, or on behalf of Vital Energi, to report any suspected bribery in accordance with the procedures set out in the Policies or in the case of third parties to the Senior Management. Vital Energi will support any individual who make such a report in good faith.



**Gary Fielding**  
Joint Managing Director  
Date: March 2018



**Ian Whitelock**  
Joint Managing Director  
Date: March 2018

### KEY QUOTE

**"The Board of Directors are committed to this policy and maintain an on-going effort to ensure the integrity of the organisation"**

GARY FIELDING &  
IAN WHITELOCK,  
JOINT MANAGING  
DIRECTORS

The original signed copy of this document is retained by the SHEQ Department  
Date Reviewed: 5th March 2018.