



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

Vital Energi is committed to ensuring that its business is conducted accordingly to ethical, professional and legal standards in a fair, honest and open manner. We will endeavour to ensure that this is reflected in every aspect of business that we undertake, so that we bring integrity to all our dealings.

Bribery and corruption expose Vital Energi, its employees and business partners or any persons or companies performing services for or on behalf of Vital Energi to the risk of criminal prosecution in addition to harming Vital Energi's reputation.

Accordingly, Vital Energi is committed to operating a zero-tolerance approach to all forms of bribery and corruption by implementing and enforcing effective systems 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 ALWAYS:

- Comply with this Anti-Bribery and Corruption Policy.
- Be guided by our Vision and Values.
- Comply with company policy on gifts, hospitality, entertainment, political contributions and charitable donations.
- Record all activities and transactions accurately, completely and transparently.
- Make it clear to business partners or any persons or companies performing services for or on behalf of Vital Energi that offering or paying any kind of bribe on our behalf is unacceptable.
- Follow appropriate due diligence and other risk mitigation procedures before proceeding with any contract or other agreement.
- Seek advice if unsure how to proceed.
- Report any suspected or actual breaches of this policy promptly and accurately.

### WILL NEVER:

- Participate in any form of corrupt behaviour.
- Use company funds, in the form of payments or gifts and hospitality, for any unlawful, unethical or improper purpose.
- Authorise, make, tolerate or encourage, or invite or accept, any improper payments to obtain, retain or improve business.
- Permit anyone to offer or pay bribes or make facilitation payments on our behalf, or do anything else we would not be permitted to do ourselves.
- Offer or give anything of value to a public official (or their representative) to induce or reward them for acting improperly in the course of their public responsibilities.
- Offer or accept gifts or hospitality, if we think this might impair objective judgement, improper influence a decision or create a sense of obligation, or if there's a risk it could be misconstrued or misinterpreted by others.
- Knowingly pay more than the market price for goods and services to anyone as a favour or for something in return.

**BREACH:** We will investigate every allegation or suspicion of a breach of this Policy and take appropriate action. Depending on the circumstances, if the investigation establishes that an act of bribery or corruption has taken place, this may include disciplinary action up to and including dismissal.

**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 and will not be penalised for doing so.

As part of our commitment to UK Bribery Act 2010 (the "Act"), we will communicate this policy to all employees and organisations working on our behalf, and ensure the latest version is made available on our website, in order it can be openly viewed by interested parties as appropriate.

  
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**Gary Fielding**

Joint Managing Director  
Date: March 2019

  
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**Ian Whitelock**

Joint Managing Director  
Date: March 2019