

Vertex Services Group values its reputation for ethical behaviour and for financial honesty and reliability. We recognise that over and above commission of any crime, any involvement in bribery will also reflect adversely on our image and reputation.

The aim of this policy therefore is to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy.
- Training all relevant employees so that they can recognise and avoid the use of bribery by themselves and others;
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecutions.
- Taking firm and vigorous action against individual(s) involved in bribery

## The Policy

Vertex Services Group prohibits:

The offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement:

- To or from any person or company, wherever they are situated and whether they are public officials or body or private person or company
- By any individual employee, agent or other person or body acting on behalf of Vertex Services Group.
- In order to Gain any commercial, contractual or regulatory advantage for the Vertex Services Group in a way which is unethical.
- Or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

## Further Clarification

Vertex Services Group recognises that the market practices across territories in which it does business and what is normal and acceptable in one place may not be in another. This policy prohibits any inducement which results in a personal gain or advantage to the recipient or body associated with them, and which is intended to influence them to take action which may not be solely in the interest of Vertex Services Group or of the person or body employing them or whom they represent.

This policy is not meant to prohibit the following practices providing they are proportionate and are properly recorded.

- Normal and appropriate hospitality
- The giving of a ceremonial gift on a festival or at another special time
- The offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose

Inevitably, decision as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to a senior manager.

## Employee responsibility

The prevention, detection and reporting of all employees throughout the Vertex Services Group suitable channels of communication by which employees or others can report confidentially any suspicion of bribery will be maintained via the Whistleblowing procedure.

## Company statement

This policy is to ensure Vertex Services Group and their employees conduct business in an honest way, and without the use of corrupt practices or acts of bribery to obtain an unfair advantage.

This is not just a cultural commitment on the part of the organisation; it is a legal requirement.

This policy has been adapted by Vertex Services Group and it is of utmost importance that this policy applies a “zero tolerance” approach to acts of bribery and corruption. Vertex Services Group will carry out periodic risk based reviews of contracts, activities and undertake rigorous staff training programmes.



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