Title: **VALLEY PROVINCIAL LTD ANTI-BRIBERY POLICY**

Introduction

The Company values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy in line with the Bribery Act 2010.
- Establishing and implementing appropriate anti-bribery procedures.
- Communicating the policies and procedures to employees and to others who will perform services for the Company.
- Undertaking due diligence measures before engaging others to represent the Company in its business dealings.
- Monitoring and reviewing the risks and the effectiveness of the anti-bribery procedures that are in place.

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

- To or from any person or company (wherever they are situated and whether they are a public official or body or private person or company);
- By any individual employee, agent or other person or body acting on the Company's behalf.
- In order to gain any commercial, contractual or regulatory advantage for the Company in a way that is unethical.
- Or in order to gain any personal advantage (pecuniary or otherwise) for the individual or anyone connected with the individual.

This policy prohibits any inducement that results in a personal gain or advantage to the recipient, or any person or body associated with them, and which is intended to influence them to take action that may not be solely in the interests of the Company or of the person or body employing them or whom they represent.

This policy is not meant to prohibit normal and appropriate hospitality or the giving and receiving of a ceremonial gift on a festival or at another special time, providing they are customary in a particular market, are proportionate and are properly recorded.

Inevitably, decisions as to what is acceptable may not always be easy. If you are in any doubt as to whether a potential act constitutes bribery, the matter should be referred to a Director before proceeding.

EMPLOYEES RESPONSIBILITIES

The prevention, detection and reporting of bribery is the responsibility of all employees, and the Company is committed to:

- Encouraging employees to be vigilant and to report any suspicion of bribery.
- Providing employees with suitable channels of communication and ensuring that sensitive information is treated appropriately.
- Investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution.
- Taking disciplinary action against any individual(s) involved in bribery.

Any suspicion of bribery should be reported in confidence to Paul Brown, who has overall responsibility for bribery prevention.

Signed: Paul Brown _____

Paul Brown, Managing Director

Date: **16.12.2024** _____

Review date: **16.12.2025** _____