

---

# Bribery Policy

---

## Statement

**The Chief Executive Officer of Virtua UK Ltd recognise that they have a legal duty of care towards complying with the Bribery Act 2010 which may affect employees and others who may be affected by the Company's activities. In order to discharge these responsibilities, the Chief Executive Officer will so far as is reasonably practicable:-**

1. Operate the business in compliance with the Company's HR Policies and Procedures or Bribery act 2010, whichever is the more stringent.
2. Provide such resources as are required to ensure that the standards described in this policy statement are achieved and maintained.
3. Provide an organisational structure that clearly defines the responsibilities for monitoring risks the company may be exposed to regarding bribery and for ensuring that the systems and procedures relating to this policy statement are rigorously applied.
4. Virtua will provide guidance to all employees on acceptance of corporate gifts / awards / rewards (be they of direct financial or material nature) and ensure that where such gifts are presented to an employee, they are recorded. Records will be retained for a period of *10 years or the duration of a client / supplier contract*, whichever is the greater.
5. Ensure that all persons employed have reasonable experience and/or the training necessary, to achieve the level of competence required to identify possible occurrences of bribery. Virtua will adopt a zero tolerance policy towards any employee who is found to be culpable in acts of bribery, corruption, extortion, embezzlement and excessive giving of gifts.
6. Satisfy itself that any company who is contracted to carry out work on behalf of Virtua UK Ltd is able to demonstrate that it pays due regard to bribery matters.
7. Virtua will adopt a zero tolerance policy towards any individual or organisation (including, but not limited to, suppliers, contractors and agents) representing the company who is found to be culpable in acts of bribery, corruption, extortion, embezzlement and excessive giving of gifts.
8. Bring this Policy Statement to the attention of all employees and others (as required) and to seek their co-operation in supporting the Chief Executive Officer and the Board of Directors in their efforts to achieve and maintain a zero tolerance attitude towards bribery.
9. Strive for continual improvement with regards to identifying and improving identification of bribery within the work place.
10. Virtua may give introduction rewards for any business which is obtained through an individual or company; on the condition that the individual or company does not influence the decision for any awarding of the contract and the reward does not form any part of the procurement of the contract.

---

11. Virtua may give rewards / gifts for work of exceptional quality and for other work related performance but these will not and do not form any part of the contractual terms for working for Virtua.

**This Policy Statement, together with its associated organisational arrangements and procedures, will be subject to continuous review in order to reflect business activities. In addition the undersigned will carry out a formal review of this Policy Statement and its associated procedures on an annual basis.**

Signed: 

Date: 09.08.2022

Name and Title: Andy Richards (Chief Executive Officer)