



## ANTI-BRIBERY & CORRUPTION POLICY

## **ANTI-BRIBERY & CORRUPTION POLICY**

Virgin Wines is committed to maintaining the highest standards and promotion of good practice in the prevention of bribery, corruption and malpractice.

In line with the UK Bribery Act, bribery or corruption of any kind in any jurisdiction regardless of local custom or practice is strictly prohibited.

**This policy covers:**

- Giving and receiving bribes
- Giving and receiving facilitation payments
- Gifts

All Virgin Wines employees and Associated Third Parties are expected to conduct Virgin Wines' business legally, ethically and with the highest levels of integrity.

## **GIVING AND RECEIVING FACILITATION PAYMENTS**

Virgin Wines defines a facilitation or “greasing” payment as a payment made to a government employee or other official to speed up an administrative process. Facilitation payments are specifically prohibited under terms of the UK Bribery Act 2010 and therefore it is a criminal offence for Virgin Wines employees or Associated Third Parties to offer or make a facilitation payment.

## **GIFTS**

Virgin Wines employees should understand that they accept gifts on behalf of the business and not in a personal capacity.

Virgin Wines employees may accept gifts from suppliers and business partners of items with modest value, but may not accept valuable items.

Gifts which Virgin Wines give must be of modest value, legal under local law, and approved by management. Modest value is defined as £100.00.

All gifts given or received must be declared to, and documented by the HR team.

## **HOSPITALITY/ENTERTAINMENT**

Virgin Wines employees may give and accept reasonable, hosted entertainment (i.e. where the person or organisation which bears the cost of the event is represented at the event).

Un-hosted entertainment should be treated as a gift. We will not give or accept lavish or frequent entertainment, or entertainment which is not hosted.

## **BUSINESS TRAVEL EXPENSES FOR THIRD PARTIES**

Virgin Wines will reimburse reasonable travel and subsistence expenses incurred by third parties for individuals who attend Virgin Wines events of behalf of the third party, in line with amounts set in our Travel and Expenses Policy.

## **CONTRACT TERMS**

All payment terms in contracts must have clear commercial justification, with fair and proportionate benefits for all parties.

## **POLITICAL DONATIONS**

All political contributions made by Virgin Wines must be approved by the Board of Directors, recorded in writing and disclosed in financial statements.

## **CHARITABLE DONATIONS**

All charitable donations made by Virgin Wines must be approved by management, recorded in writing and disclosed in the financial statements.

## **CONFLICTS OF INTEREST**

Virgin Wines is committed to doing business with transparency. Should conflicts of interest arise, we will declare the existence and nature of the potential conflict to all affected parties and ensure the interests of the business are safeguarded.

## **RISK ASSESSMENTS**

Virgin Wines will regularly and comprehensively assess the nature and extent of the risks relating to bribery and corruption to which it is exposed, recognising that risks are potentially present both internally and externally.

Virgin Wines will ensure that any person involved in carrying out risk assessment exercises under this Anti-Bribery and Corruption Policy is adequately skilled and equipped to do so and will engage appropriately qualified external professionals where necessary.

## **ASSOCIATED THIRD PARTIES/DUE DILIGENCE**

All Associated Third Parties are subject to the provisions of the UK Bribery Act, wherever in the world they are based or act on our behalf. Virgin Wines is committed to investigating and being fully informed about the individuals and organisations with whom it has business dealings and about the markets in which it operates.

Due diligence enquiries will be performed which are designed to, amongst other things:

- Confirm a third party's role and position.
- Confirm that a third party has a reputation for integrity and proper business conduct/discover when a third party has any history of corrupt conduct.
- Confirm that a third party has sufficient experience and expertise to competently fulfil their contracted role.

## **COMMUNICATION AND TRAINING**

Virgin Wines will communicate this policy to all employees and Third Party Associates, and develop procedures as appropriate to each business to ensure that these policies are followed.

Employees and, where appropriate, anyone acting on Virgin Wines' behalf will receive appropriate training on the terms and implementation of this policy together with the relevant reporting procedures.

## **MONITORING AND REVIEW**

Graeme Weir, CFO will ensure that this policy is monitored and reviewed on a regular basis and adapted to changing circumstances or in response to any incidents involving bribery and corruption. Virgin Wines CEO takes ultimate responsibility for the implementation and enforcement of this policy with day-to-day matters being dealt with by Graeme Weir, who reports directly to the CEO.

## **REPORTING**

If in the course of your employment you are offered a bribe or become aware of an activity in breach of this policy then please report this immediately to your manager or a company Director. Reports will be taken seriously and if appropriate, fully investigated.

## **WHISTLEBLOWING POLICY**

We operate a Whistleblowing Policy so that all employees know they can raise concerns about any practices within the business or the supply chain, without any fear of reprisals.