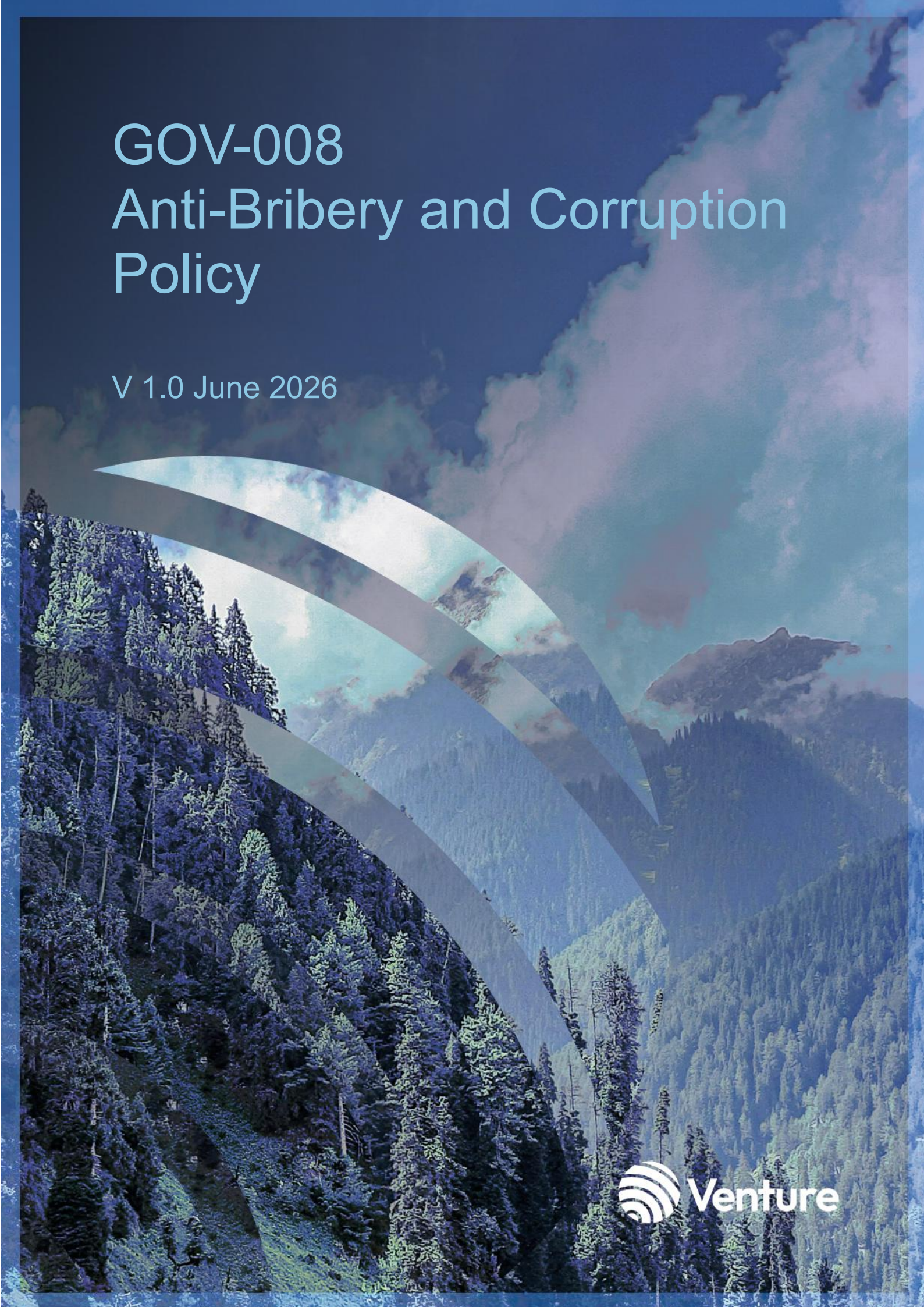
GOV-008
Anti-Bribery and Corruption Policy

V 1.0 June 2026



Version	Date	Author	Changes Made	Next Review
1.0	01 June 2026	HR & Ops Director	Initial policy issue	01 June 2027

Policy Overview

At Venture, we are committed to conducting business ethically, transparently, and with integrity in all our dealings. We maintain a zero-tolerance approach to bribery and corruption and are committed to complying with all applicable anti-bribery and anti-corruption laws, including the UK Bribery Act 2010. This policy establishes the framework through which Venture prevents, identifies, manages, and responds to bribery and corruption risks. It supports our commitment to ethical business practices, protects our reputation, and reinforces trust with customers, employees, suppliers, partners, and other stakeholders.

The policy applies to all employees, directors, contractors, consultants, agency workers, suppliers, and any third parties acting on behalf of Venture.

Commitment

We are committed to:

Ethical Business Conduct
Conducting all business activities honestly, fairly, and professionally while maintaining the highest standards of integrity and ethical behaviour.

Prevention of Bribery & Corruption
Preventing bribery, corruption, facilitation payments, kickbacks, and any improper influence in all business dealings, regardless of location or business circumstances.

Legal & Regulatory Compliance
Complying with all applicable anti-bribery and anti-corruption legislation, regulations, contractual obligations, and industry standards in every jurisdiction in which we operate.

Transparency & Accountability
Maintaining accurate records, transparent financial controls, and appropriate oversight to ensure business decisions are made objectively and can withstand scrutiny.

Third-Party Integrity
Working only with partners, suppliers, subcontractors, and representatives who share our commitment to ethical conduct and compliance with anti-bribery requirements.

Awareness & Training
Providing appropriate training, guidance, and awareness to ensure employees understand their responsibilities and can recognise and respond to bribery and corruption risks.

Speak-Up Culture
Encouraging employees and stakeholders to raise concerns without fear of retaliation and ensuring all reports are investigated appropriately and confidentially where possible.

Risk Based Approach

We recognise that bribery and corruption risks vary across customers, suppliers, projects, locations, and business activities.

Venture is committed to identifying, assessing, and managing bribery and corruption risks through proportionate controls, due diligence processes, financial oversight, management review, and continual monitoring.

Gifts, Hospitality and Business Courtesies

Reasonable and proportionate gifts, hospitality, and business courtesies may be offered or accepted where they:

- Are lawful and appropriate.
- Are not intended to influence a business decision improperly.
- Are transparent and capable of public disclosure.
- Are consistent with normal business practice.
- Do not create an actual or perceived conflict of interest.

Employees must not offer, promise, request, give, or accept gifts, hospitality, or other benefits that could improperly influence business decisions or compromise professional judgement.

Cash gifts or cash equivalents must never be offered or accepted.

Quality Objectives

This policy provides the framework for establishing and reviewing anti-bribery and corruption objectives which support Venture's strategic direction, including:

- Maintaining compliance with applicable anti-bribery legislation and regulatory requirements.
- Promoting an ethical culture across the organisation.
- Increasing employee awareness through training and communication.
- Conducting appropriate due diligence on suppliers, partners, and third parties.
- Monitoring and investigating reported concerns promptly and effectively.
- Maintaining effective financial controls and record keeping.
- Continually improving anti-bribery controls and governance arrangements.
- Protecting Venture's reputation and stakeholder trust.

Leadership Commitment

Senior Leadership Team members are responsible for:

- Demonstrating visible commitment to ethical business practices and compliance.
- Establishing and maintaining effective anti-bribery and corruption controls.
- Ensuring bribery and corruption risks are assessed and managed appropriately.
- Providing adequate resources, training, and oversight.
- Supporting the reporting and investigation of concerns.
- Reviewing the effectiveness of this policy and associated controls on a regular basis.
- Leading by example and promoting a culture of integrity throughout the organisation.

Employee Responsibilities

All employees are responsible for:

- Complying with this policy and all related procedures.
- Acting honestly and ethically in all business activities.
- Avoiding situations that could create actual or perceived conflicts of interest.
- Reporting suspected bribery, corruption, fraud, or unethical behaviour immediately.
- Maintaining accurate records of business transactions and expenses.
- Completing required training and awareness activities.
- Cooperating fully with any investigations relating to suspected misconduct.

Reporting Concerns

Employees, contractors, and third parties are encouraged to report any concerns regarding suspected bribery, corruption, unethical conduct, or breaches of this policy.

Reports may be made through line management, Human Resources, the Operations function, or other designated reporting channels.

Venture will not tolerate retaliation against anyone who raises a concern in good faith, even if the concern is ultimately unsubstantiated.

Breaches of Policy

Any breach of this policy will be taken seriously and may result in disciplinary action, termination of employment or contract, legal proceedings, and/or notification to relevant authorities where appropriate.

Communication and Review

This policy is communicated throughout the organisation and made available to relevant interested parties.

It is reviewed at least annually, and whenever significant legislative, regulatory, organisational, or operational changes occur, to ensure it remains effective, appropriate, and aligned with Venture's commitment to ethical business conduct and compliance.