

# Together in Powering the Future

BRIBERY, CORRUPTION AND FACILITATION PAYMENTS POLICY

V3

The world of energy is changing and we are too. We're harnessing our 20+ years of experience in traditional energy markets and pushing forward our boundaries to enter a new era supporting the full energy mix and technology sectors. Visuna are here to power forward together into a brighter, cleaner and more reliable future.

At Visuna, we are on a journey with you in the energy transition. We are here to offer support in moving into sustainable markets at such an exciting time for energy and IT sectors.

Transformation is happening rapidly, and at Visuna we pride ourselves on our dedication to supporting companies in their energy innovation goals. As a leading recruitment company, we provide [global workforce solutions](#) in energy & tech. We serve as a transparent & reliable strategic partner to connect our world-class talent to you.

## Our Mission & Values

**Visuna's mission is to deliver maximum value to our clients and enabling opportunity insight. By providing an honest, flexible and proactive service, we find the right solutions for both our candidates and clients.**

It has been consistently important to us to provide the best service to our clients and key strategic partners over the years. At Visuna we believe we owe confidence and loyalty to those that we work with. We provide a friendly and sincere service to those we meet along the way.

It is important to us to provide a down to earth, no nonsense, and sincere foundation for interactions with the energy & tech communities. Visuna stand as a passionate and proactive organisation on the world stage. We stand together moving into powering the energy transition to a greener world overall via renewable energy sources.



### Growth

We thrive on evolving and pushing our boundaries



### Reliability

We honour our commitment to finding the right solution



### Agility

We are proactive and flexible in challenging circumstances



### People

We believe that together we can make a difference by showing care and being respectful



### Honesty

We are straightforward and build our reputation on trust

## 1. Overview

This policy sets out the responsibility of the Company (and everyone who works for the Company) to adhere to high standards set for conducting our business affairs. You will find specific guidance in this policy on recognising and addressing bribery and corruption, whether in the UK or overseas.

The policy applies to all employees, contractors, candidates, officers, interns, casual and agency workers, and anyone else under the Company's control. It does not form part of your contract of employment and can be amended at any time.

## 2. Our Commitment and your obligations

The Company is committed to absolute integrity and fairness across all our operations and accordingly will not tolerate any activities involving bribery or corruption.

If you are employed or engaged by the Company, or in any other way under our control, you are obliged to take responsibility for preventing, detecting, and reporting anything you believe amounts, or could amount, to bribery or corruption.

You must report any conduct or activity that you suspect amounts to bribery or corruption to your manager or a Company Director. Please consult our policy on whistleblowing for further information about raising concerns.

The Company will never treat anyone less favourably for refusing to become involved in bribery or corruption or who flags up their concerns to us in good faith. Should you suffer any retributive treatment in this context, you must talk to your manager. You can raise the matter formally under our Grievance Policy CD004a if you are not satisfied that it has been resolved informally.

## 3. What is Bribery?

Bribery is illegal, it undermines competitive business environments and harms the interests of companies, and the societies British businesses operate in. It is an offence under the Bribery Act 2010 for the British nationals or someone who is ordinarily resident in the UK, a body incorporated in the UK, or a Scottish partnership to bribe anywhere in the world.

There are 4 key offences established by the [Bribery Act 2010](#):

- Offering, promising, or giving of a bribe to another person
- Requesting, agreeing to receive, or accepting a bribe
- Bribery of a foreign (non-UK) public official and
- Failure by commercial organisations to prevent bribery committed by their associated persons to obtain or retain business, or an advantage in the conduct of business.

Consequently, the Bribery Act places obligations on companies to prevent bribery offences in their operations. An organisation that can prove it has adequate procedures in place to prevent persons associated with it from bribing will have a defence to the section 7 offence.

#### 4. What is Corruption?

The Company defines corruption as the abuse of power, authority, or position in return for personal gain.

##### 4.1 What is allowed?

Offering or receiving hospitality and entertainment from third parties is allowed under this policy provided that it is appropriate and reasonable in the circumstances and the purpose is to:

- build or maintain business relationships;
- enhance or maintain the Company's reputation; or
- help market the Company's products and services more effectively.
- You may also give and accept gifts, but only if you observe all of the following conditions:
  - you have your manager's prior approval in every case;
  - you are not giving or receiving the gift as a bid to influence a business decision;
  - you are not giving or receiving the gift as a reward for new business or retaining existing business;
  - you are not giving or receiving the gift in return for any other benefits or favours;
  - you are giving the gift on behalf of the Company and not in your own name;
  - you are not giving cash or any kind of cash equivalent, such as vouchers;
  - your gift is appropriate for the context e.g. a small gift offered at Christmas;
  - your gift is not given in secret; and
  - your action complies with local laws.

It is generally acceptable to give or receive low-value business-related gifts, e.g., branded umbrellas.

You can reimburse a third party for business-related expenses – the costs of attending a meeting, for example – and you can also accept a third party's offer to pay your expenses. Although this does not normally constitute bribery, any payment made or received that exceeds reasonable or genuine business expenses is not acceptable. An example would be payment for an extended stay in a hotel before or after business had been concluded.

## 5. What are Kickbacks and Facilitation Payments?

The Company never makes or receives kickbacks or facilitation payments as defined below.

- Kickbacks - payments made in return for a business advantage or favour.
- Facilitation payments - unofficial payments, usually small, made to speed or smooth out a routine process or activity. They are sometimes described as 'back-handers', and recipients typically include government or other officials.

You must avoid being put in a position where you might be asked to make or accept a Kickback or Facilitation Payment on the Company's behalf. You must also avoid being put in a position from where it could be inferred that such payment was available.

All payments made on behalf of the Company must be in proportion to the goods and services involved. Always ask for a receipt, and if you have any concerns you must discuss them with a Director and/or Quality Manager without delay.

## 6. Keeping Records?

You must keep written records of any gifts or hospitality you have given or received and declare these. All associated expenses claims must give full details of the reason for the expenditure and be submitted to the Company using the process laid out in our expenses policy.

Invoices and other records relating to third-party dealings, including those with customers and suppliers, must be accurate and complete. You must never maintain 'off-book' accounts to conceal or facilitate payments of any kind.



Kelly Walker  
Operations Director

## Change Table

Version	Date	Description	Approved by
3	13 May 2025	<ul style="list-style-type: none"> <li>• New Visuna format applied</li> <li>• Section 3. What is Bribery? - Description changed</li> <li>• Operations Director signature updated May 2025</li> </ul>	K Walker