

Anti-Bribery & Corruption Policy

This policy aims to reduce our potential exposure to corrupt practices by formalising our commitment to maintaining business integrity and values. This policy applies to everyone involved in the business.

We aim to conduct our business with honesty and integrity at all times and will not participate in activities designed to provide an 'unfair' advantage to our company. We do not offer or receive any form of unethical incentives or payment.

Van Walt Ltd prohibits:

- The offering, giving or acceptance of any bribe, whether money or other, to or from any person or company.
- Any employee acting on Van Walt's behalf in order to gain any commercial, contractual or regulatory advantage for Van Walt Ltd in a manner which is unethical
- Or in order to gain any personal advantage, financial or otherwise, for the individual or anyone connected with that individual.

To achieve our policy, we are committed to:

- Communicating this policy to employees and other affected parties
- Training all Van Walt employees to recognise and report any corrupt practices undertaken by themselves or others.
- Handling information received with sensitivity and confidentiality
- Investigating all allegations of fraud, bribery and other corrupt practices
- Immediately informing the police and relevant authorities where a crime may have been committed
- Co-operating fully with officials during any investigations or legal proceedings
- Taking swift action against anyone confirmed as being involved in corrupt practices
- Implementing disciplinary procedures concerning anyone in breach of this policy

Preventing, identifying and reporting of bribery is the responsibility of everyone working for, or on behalf of, Van Walt Ltd. All staff must therefore:

- Act with honesty and integrity at all times
- Respect our customers, suppliers and any other parties with whom Van Walt interacts, in order to achieve our objective of conducting business in an ethical, lawful and professional manner.
- Comply with laws and regulations of all countries in which Van Walt Ltd operates.

Van Walt Ltd is committed to maintaining the highest standards of ethics and integrity throughout its business practices and relationships. We aim to conduct our business with truth and honesty at all times and we strictly prohibit bribery and corruption in our operations and supply chain. In line with the Bribery ACT 2010 and Competition Act 1998. Van Walt take the following steps to ensure compliance:

- Carrying out risk assessments to allows us to better evaluate and mitigate these risks.
- Keeping accurate books and record-keeping
- Monitoring and internal audits
- Employee training

Van Walt has reviewed its processes in line with the Bribery Act 2010 and is committed to reviewing on an ongoing basis the effectiveness of its policies and procedures in relation to anti-bribery measures.

All employees are encouraged to report any concerns they may have of potential breach of the Anti-Bribery Policy as soon as possible, this includes any instances where they may be the victim of attempted bribery. Van Walt is committed to ensuring that its employees have a safe and confidential way of reporting suspected brobery. All concerns will raised directly with the managing director. Any reports of bribery, corruption or anti-competitive behaviour will be taken seriously and a full investigation carried out byt the managing director. Van Walt Ltd will apply a 'zero tolerance' approach to acts of bribery and corruption. Any breach of this policy will be regarded as a serious matter and is likely to result in disciplinary action.

Where it is confirmed or suspected that an external third party is guilty of bribing or attempting to bribe our employees, suppliers or customers they will be informed in writing that any business dealings with them will be ceased immediately and the appropriate authorities will be informed.



David van Walt
Managing Director

06/01/2025