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# **POLICY AGAINST BRIBERY, CORRUPTION & MONEY LAUNDERING**

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## Introduction

This policy is issued by **VIA Outlets B.V.** (hereinafter referred to as “VIA Outlets”, “the Company”, “we”, “us”). We highly value lawful and ethical business behaviour and we are committed to maintaining high standards of integrity, transparency and accountability in all that we do. This includes complying with laws and regulations aimed at combating corruption, bribery, money laundering and terrorism financing (hereinafter the “**Bribery & Corruption Laws**”).

Corruption, bribery, money laundering and financing terrorism are criminal offences. These unlawful practices not only endanger VIA Outlets’ ethical values, but also create various risks for our business, such as legal, financial and criminal risks, loss of trust and investments, as well as irreversible damage to our reputation and business strategies.

This Policy has been prepared to give clear guidance to everyone within VIA Outlets on their responsibilities in observing and upholding VIA Outlets’ position on corruption, bribery and money laundering and to ensure compliance with the applicable Bribery & Corruption Laws in every jurisdiction where VIA Outlets operates, such as the UK Bribery Act 2010 and the European Anti-money Laundering Directives (AMLD). Bribery & Corruption Laws vary from country to country, but this Policy applies to everyone within VIA Outlets, wherever they are located.

## Corruption, Bribery and Money-Laundering

**Bribery** occurs when a person offers, gives or promises to give a financial or other advantage to another individual to influence a decision or a process.

Bribery also occurs when a person requests, accepts or agrees to accept an advantage, in exchange for improperly performing a function or activity.

**Corruption** refers to misusing public power for personal gain. It can be done by an elected politician, civil servant, police officer or anyone in authority.

**Money-laundering** occurs when the location, source, ownership or control of funds are falsified, i.e., when money or assets coming from illegal sources are altered to make it look legitimate. It also occurs when someone becomes aware of, or suspects, the existence of criminal activities within the business without reporting any concern.

It also includes money that is used to fund terrorism, regardless of how it is obtained. Money laundering is a serious threat to the legitimate economy and threatens the integrity of our business.

Bribery, corruption and money-laundering are criminal offences and can result in severe civil and criminal penalties. Individuals found guilty of such offences may face penalties ranging from (criminal) fines to imprisonment, depending on the applicable legislation in the various VIA Outlets jurisdictions. Company officers and directors can be disqualified, and the Company could face high fines, significant reputational damage and loss of business.

## Our Policy

VIA Outlets prohibits any instances of bribery, corruption or money laundering.

VIA Outlets expects you to look out for warning signs that such a wrongdoing may be taking place and to report any reasonable suspicion of bribery, corruption or money laundering involving or regarding the VIA teams but also our suppliers, partners or VIA Outlets' business. You can report any such (suspected) wrongdoing to VIA Outlets' Compliance Manager, the Head of Legal or through the SpeakUp channel ([Speakup@viaoutlets.com](mailto:Speakup@viaoutlets.com)).

### Who Does This Policy Apply to?

This Policy applies to all VIA Outlets employees (whether permanent or temporary) as well as temporary agency workers, interim workers, trainees or apprentices and Company directors and officers – together described as “you”.

This Policy also applies to any third party working on behalf of VIA Outlets (whether permanently or temporarily) who is not an employee, such as (but not limited to) consultants, secondees, agents and intermediaries, contractors, service providers and suppliers or third parties engaged by or representing VIA Outlets (“**Business Partners**”).

VIA Outlets can incur liability for acts of third parties even where it does not know an illegal activity is taking place, e.g., a third party is paying a bribe on its behalf.

## PRINCIPLES

VIA Outlets strictly prohibits any form of bribery, corruption or money laundering as outlined in the definitions above. In the following paragraphs, we describe certain examples of situations of bribery, corruption and money laundering that may be relevant for our Company.

### 1) Facilitation Payments

Facilitation payments are payments made directly or indirectly to secure or speed up routine processes and procedures to government officials. Facilitation payments are different to an official fast-track process, which can be acceptable. We ask that you are vigilant particularly when dealing with government procedures abroad. While facilitation payments may be permissible as a matter of certain countries' local laws, they are prohibited in most other jurisdictions where the Company conducts business and may result in the appearance of impropriety and damage the Company's reputation. For these reasons, the Company prohibits any facilitation payments, regardless of the amount involved, by Company employees or Business Partners except:

- 1) If permitted under local law and not prohibited under other laws applicable to the Company's business; and
- 2) After written pre-approval obtained from the Centre/ Business Director, Regional Business Director and your VIA Responsible Lawyer.

Contact your VIA Responsible Lawyer or the Head of Legal if you have any questions about a particular process.

## 2) Gifts and Hospitality

This Policy does not prohibit appropriate and proportionate hospitality given to or received from a third party. All gifts and hospitality given or received must be bona fide hospitality, promotional or other appropriate gifts or entertainment which can be deemed reasonable and proportionate for our business. Please refer to VIA Outlets' Gifts and Hospitality Policy for further information. This policy is published in the Policies section on VIAShare.

## 3) Political Contributions

You are not permitted, under any circumstances to make political contributions on behalf of VIA Outlets without having first obtained approval from the Head of Legal or your VIA Responsible Lawyer.

## 4) Money Laundering

Criminals often buy high value items for cash, and then sell them off quickly to obtain "legitimate" money in the bank. Or they co-invest in companies that buy businesses, lease expensive real estate or buy high value products.

## RESPONSIBILITIES

Everyone who is working for or on behalf of VIA Outlets must comply with this Policy. Your vigilance and awareness are crucial to prevent bribery, corruption or money laundering within VIA Outlets. Please follow this VIA Outlets Policy and take the regular re-fresh courses on bribery, corruption and money laundering to ensure the necessary due diligence takes place before engaging or entering into a relationship with any third parties (such as suppliers or brands), and make sure you report anything that seems to be a reason for concern to VIA Outlets' Compliance Manager, the Head of Legal or through the SpeakUp channel ([Speakup@viaoutlets.com](mailto:Speakup@viaoutlets.com)).

No one will be victimised or otherwise negatively treated as a result of a report of suspected wrongdoing made in good faith, as further described in the [VIA Outlets Whistleblowing Policy](#).

Engaging in bribery, corruption or money laundering, or authorising it, overlooking it or ignoring it is a serious disciplinary offence. A breach of this Policy will result in an investigation and, where possible under applicable legislation, disciplinary action up to and including dismissal for gross misconduct as well as actions against Business Partners.

## REVIEW

All employees (permanent or temporary), contractors, secondees, agents and directors will be informed of this Policy at the start of their employment and Business Partners will be informed upon commencement of the contractual relationship. VIA Outlets shall organise training sessions on this topic to its staff and have available a copy of this Policy on VIAShare where it can be accessed for future reference.

## **GETTING HELP**

Where in doubt, advice can be obtained in confidence from VIA Outlets' Compliance Manager or VIA's Head of Legal.