



Document	VGRP-35
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Owner	Managing Director

Ethical Conduct & Anti-Bribery Policy

Kaneas family group policy - applies to Vital GRP, Vital Manufacturing, Vital Distribution, GRP Express and Vital Global.

 KANEAS	 Vital VITAL GRP	 Vital VITAL DISTRIBUTION	 GRP EXPRESS
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We are committed to the highest practical standards of ethical conduct. We have zero tolerance for bribery and corruption and require business to be conducted honestly, fairly, lawfully and with integrity.

This policy applies to employees, directors, agency and temporary workers, contractors, consultants, agents, suppliers, sponsors and other persons acting for or on behalf of a Kaneas family business.

Our requirements

- Comply with the Bribery Act 2010 and applicable anti-bribery and anti-corruption law in every jurisdiction in which we operate.
- Never offer, promise, give, request, agree to receive or accept a bribe or improper advantage.
- Never make facilitation payments, create off-record accounts or conceal improper payments.
- Keep accounts, invoices, receipts and third-party records accurate, complete and transparent.
- Apply proportionate due diligence to agents, suppliers, contractors and other associated persons.
- Report actual or suspected bribery, corruption, conflicts or unethical conduct promptly.

Gifts and hospitality

Reasonable and proportionate gifts or hospitality may only be offered or accepted when they are lawful, openly recorded, appropriate in value and timing, and not intended to influence a decision or secure an improper advantage. Cash and cash equivalents are prohibited. Approval must be obtained where required by group procedures.

Speaking up

Concerns should be raised with a manager, the Managing Director or through the Whistleblowing Policy. We support people who raise genuine concerns in good faith and do not tolerate retaliation against anyone who refuses to participate in bribery or reports a reasonable suspicion.

Breaches

A breach may result in disciplinary action, termination of a commercial relationship and referral to the appropriate authorities. All employees and associated persons share responsibility for preventing, detecting and reporting bribery and corruption.



Kevin Webb
Managing Director
Approved 12 February 2026