



Van Drunen Farms®

FUTURE  CEUTICALS

Anti-Bribery and Corruption Policy

Van Drunen Farms (VDF) is committed to conducting business legally and ethically within the framework of a free enterprise system and strictly prohibits corrupt arrangements with customers, suppliers, government officials, or other third parties.

What is Corruption?

Corruption, as defined by Transparency International, is the abuse of entrusted power for private gain. Corruption undermines democratic institutions, hinders economic development, and contributes to instability, inequality, poverty, social division, and environmental harm.

What is Bribery?

Bribery means offering a financial or other incentive or reward for actions which are illegal, unethical, or improper in any way.

The Policy

Van Drunen Farms strictly prohibits all employees, contractors, subcontractors, suppliers, vendors, consultants, agents, and other providers of goods and services who do business on behalf of VDF from engaging in any form of corruption, including engaging in any form of public sector or commercial bribery. Under no circumstances may anyone acting on behalf of VDF promise or provide anything of value directly and indirectly to a government official, or to any person or entity in the private or commercial sector, if the payment is intended to induce the recipient to misuse his or her position to obtain or retain an unfair business advantage or personal benefit.

In addition to direct payment of money, other examples of prohibited bribery payments include, but are not limited to:

- Cash equivalents (i.e. gift cards), or loans
- Lavish meals or entertainment
- “Adult” or inappropriate entertainment
- Payment for travel or entertainment
- Favors, including employment or internships
- Gifts
- Meals or entertainment given to influence official decision making or to obtain or retain business
- Donations to a charity affiliated with or sponsored by a government official
- Political contributions

Billing Office
300 W. 6th Street
Mokenca, IL 60954
1-888-472-3545

Midwest Corporate Office
2692 N. State Rt. 1-17
Mokenca, IL 60954
1-888-452-6853



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Consistent with these principles, anyone acting on behalf of VDF must comply with all applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act.

Are business courtesy gifts permitted under the policy?

A “business courtesy” gift generally refers to something of value that is provided to customers and potential customers as a means of developing a legitimate relationship with that customer. This includes meals, entertainment, and token gifts. These business courtesies are permitted if they are:

- Of modest value
- Related to a legitimate business purpose
- Lawful under all applicable local laws
- Clearly not meant to imply that the giver is entitled to preferential treatment
- Not intended to, or perceived to be intended to, influence the recipient’s ability to conduct their official duties independently and objectively

Appropriate gifts or business courtesies should usually be valued at under \$100.00. Any gifts given by VDF employees should also bear the Van Drunen Farms and/or FutureCeuticals logo if possible.

As stated in the Van Drunen Farms Employee Handbook, VDF employees should also not accept any gifts or earnings of significant value to influence a business activity or decision. Gifts of minimal value, such as less than \$100.00, may be permissible if reported to Management.

At times it may be necessary for VDF personnel to pay for travel expenses of officials, customers, suppliers, or other business associates, such as where it is necessary to visit a particular facility for an inspection. Since these offers typically require an expenditure over the \$100.00 limit, payments for travel-related expenses always require prior approval from management.

Non-Retaliation Policy

Van Drunen Farms prohibits retaliation or threats against anyone who reports violations of this policy or who assists in any kind of internal or external investigation of reported violations. Anyone who violates this non-retaliation policy will be subject to disciplinary action by VDF, including, but not limited to, disclosure of the violation to relevant government officials when required by law, and termination.

How should I report suspected policy violations?

Any suspected violation of the anti-bribery and corruption policy should be reported immediately to Van Drunen Farms management or to The VDF Safe Report email address. Employees may also report suspected violations to their supervisors or human resources representative.

You can report suspected policy violations via:

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- Online message: Please email safereport@vandrunen.com. This email address is monitored solely by the Van Drunen Farms legal team.

Last Updated: July 2021

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