

## **Anti-Bribery and Corruption Policy**

Van Drunen Farms

September 2024

**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 that 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 or 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 their position to obtain or retain an unfair business advantage or personal benefit.

Examples of prohibited bribery payments include, but are not limited to:

- Cash equivalents (e.g., 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

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.

**Target:** VDF had zero (0) incidents of corruption in 2023. We aim for zero (0) incidents of corruption in 2026.

VDF strictly prohibits employees from engaging in fraud, money laundering, or bribery. Fraud involves deception for personal or financial gain, money laundering refers to concealing the origins of illegally obtained funds, and bribery is the act of offering or accepting something of value to influence a decision improperly.

### **Governance and Allocation of Responsibilities**

- To ensure compliance with this policy, VDF has appointed an Ethics Officer to oversee anti-bribery and anti-corruption efforts. In collaboration with Human Resources, the Ethics Officer will:
  - Conduct regular audits through SEDEX.
  - Provide guidance and training to employees and third parties.
  - Ensure policies and procedures are regularly updated.
  - Oversee and review reported violations and any resulting disciplinary actions.

### **Are Business Courtesy Gifts Permitted Under the Policy?**

A "business courtesy" gift generally refers to something of value provided to customers and potential customers as a means of developing a legitimate relationship. 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, 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 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 those under **\$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 when 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 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.

## **Disciplinary Measures**

Violations of this policy will result in disciplinary action, which may include:

- Verbal or written warnings
- Suspension or termination of employment or contracts
- Reporting violations to relevant regulatory authorities

## 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:

- **Email:** [safereport@vandrunen.com](mailto:safereport@vandrunen.com) (monitored solely by the Van Drunen Farms legal team)

## Ethics Policy Acknowledgment

All employees sign **an acknowledgment** confirming they have read, understood, and agree to comply with this Anti-Bribery and Corruption Policy.

**Last Updated: September 2024**