

Anti-Bribery and Anti-Corruption Policy

Registered Office: 15 Livia Avenue, Lincoln, LN6 9ZF

Policy Owner: John Geary – Director

Applies to: All directors and any future personnel or associates

Effective Date: 16th February 2026

Review Frequency: Annual

1 Our Commitment

ViaCerta Transport Consulting Ltd is a director-led professional consultancy. We are committed to conducting all business with integrity, transparency and professionalism.

We operate a zero-tolerance approach to bribery and corruption.

No director or person acting on behalf of ViaCerta will offer, give, request, or accept a bribe in any form.

2 Legal Framework

ViaCerta complies with the UK Bribery Act 2010, which makes it a criminal offence to:

- Offer or give a bribe
- Request or accept a bribe
- Bribe a foreign public official
- Fail as a company to prevent bribery.

As a UK incorporated company, ViaCerta is subject to this legislation wherever it operates.

This policy is designed to constitute “adequate procedures” under Section 7 of the Act.

3 Scope

This policy applies to:

- All Directors
- Any future employee, contractor or associate
- Any person performing services on behalf of ViaCerta

4 What is Prohibited

ViaCerta Transport Consulting prohibits:

- Offering anything of value to improperly influence a decision
- Accepting anything of value in return for improper performance
- Facilitation payments
- Kickbacks or secret commissions
- Concealed or false accounting
- Using intermediaries to do anything unlawful on ViaCerta’s behalf.

“Anything of value” includes money, gifts, hospitality, travel, discounts, services, employment opportunities, or other advantages.

5 Gifts and Hospitality

Because ViaCerta operates in professional advisory and procurement environments, hospitality must be modest and transparent.

It is acceptable where:

- It is reasonable and proportionate
- It has a legitimate business purpose

- It is not connected to an active decision-making process
- It would not cause reputational damage if publicly disclosed

What is not acceptable:

- Cash or vouchers
- Excessive entertainment
- Hospitality during live procurement evaluations
- Any gift or hospitality intended to secure business advantage

Recording & Approval

- Any gift or hospitality over £25 must be recorded
- Gifts over £50 or hospitality over £100 per person must be agreed by both directors before being given or accepted.

A simple Gifts & Hospitality Log will be maintained.

Transparency and oversight between directors is the primary control mechanism.

6 Conflicts of Interest

Directors must declare any situation where personal interests could conflict with professional responsibilities including with our customers and clients.

Examples include:

- Financial interests in suppliers or competitors
- Personal relationships influencing business decisions
- Acting for competing parties where confidential information may create risk.

Conflicts will be shared, logged and managed transparently.

7 Third Parties

ViaCerta does not currently use agents, commission-based introducers, or overseas representatives.

If subcontractors or associates are engaged:

- Their legitimacy will be verified
- Written agreements will include anti-bribery obligations
- Commission structures that create bribery risk will be avoided.

8 Political and Charitable Contributions

ViaCerta does not make political donations.

Charitable donations must:

- Be modest
- Be unconnected to business advantage
- Be agreed by both directors.

9 Financial Controls

ViaCerta maintains simple but robust financial controls:

- All income is invoiced formally
- All payments are made via company bank accounts
- No cash payments are accepted or made
- Invoices accurately describe services
- Financial records are retained for at least six years

Accurate accounting is a key anti-bribery safeguard.

10 Reporting Concerns

Any concern about bribery or unethical conduct must be raised immediately between the directors.

Where appropriate, clients or relevant authorities will be notified.

No retaliation will occur for raising concerns in good faith.

11 Oversight and Review

The Directors and both responsible for implementation of this policy.

Both directors share responsibility for compliance.

This policy will be reviewed annually or following any material change in business activities.

12 Breach

Breach of this policy may result in:

- Termination of business relationships
- Reporting to authorities
- Civil or criminal liability.

Director Declaration

We confirm our commitment to conducting ViaCerta Transport Consulting Limited's business in full compliance with the Bribery Act 2010 and with the highest standards of professional integrity.

Signed: 

John Geary – Director

Date: 16th February 2026

Signed: 

Kate Geary – Director

Date: 16th February 2026
