

# VETCEL LTD

This is the company's position on bribery and the board's statement in relation to meeting our obligations under the 2010 Bribery Act which came into effect on the 1<sup>st</sup> July 2011.

As a commercial organisation operating almost exclusively within the UK's borders, the directors had always considered that our exposure to bribery was limited. However, Vetcel has grown considerably in recent years both in scope and in turnover and, as such, the board commissioned a policy review of our current position.

The managing director and David Reed, the company secretary, carried out an in-depth investigation on behalf of the board to ensure that our position as regards the Bribery Act was both effective and robust in the face of challenge, regardless of risk.

These are their findings in relation to the 6 principles.

1) **Proportionate procedures:** Although the company trades almost exclusively within UK borders, the launch of new and innovative products indicates that this may not always be the case. However, the current contracts procedure appears to be robust in the face of challenge in that all contracts come through an open tender process. Product purchasing requires a tender document to be submitted prior to the middle of December with annual reviews. The managing director, together with staff, produces a list of competitively priced products from those submitted in response to the tender. This list is presented to the board for their consideration and agreement. Some additional products may be required and some of those listed even challenged and these products are then judged by those directors assigned to the clinical committee and ruled upon at that time. At no stage are benefits in kind to be accepted during any part of this process and no one individual has the ultimate power of acceptance. All discussions on the acceptability, or otherwise, of a product are carried out on an "in house" open e-mail for the sake of transparency.

2) **Management commitment:** Senior management's commitment to combating any form of bribery within the company or through its agents is absolute. This extends to the acceptance of rewards for contracts offered to us or to those terms that we offer to our clients. All must be treated equally, fairly and without favour.

3) **Risk assessment:** Although the risk is currently assessed as low, the board recognise that we are moving into many areas where this may not always be the case and so propose to monitor, on an ongoing basis, our exposure as we diversify.

4) **Due diligence:** The board fully recognise the legal requirements placed upon them by the Act and the need for constant vigilance to ensure our continued compliance.

5) **Communication:** The promulgation and dissemination of the boards position on bribery to its suppliers, customers and staff are a given and to this end all contracts are offered only on a pre-accepted and transparent basis. All our clients are treated equally and our terms are published for all to see.

6) **Monitoring:** The directors recognise that Vetcel's business is both fluid and dynamic and as such we must remain on our guard to ensure that rapid changes in either our market, or the way that we trade, don't present unforeseen opportunities for abuse.

On behalf of the board of directors



Mr S.P.Renton BVM&S MRCVS