

# ANTI-FRAUD, BRIBERY AND CORRUPTION POLICY

## 1 Introduction

This document defines Wyatt Carruthers Jebb Ltd's policy on the avoidance of bribery and corruption and reflects the obligations contained in the Bribery Act 2010. Adherence to the clear guidelines set out in this policy will ensure that the practice and all its employees comply with anti-bribery and anti-corruption laws and governmental guidance.

It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption, and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems to counter bribery.

This policy applies to all Wyatt Carruthers Jebb Ltd employees and compliance with this policy is mandatory. The rules apply to all individuals working at all levels, including senior managers, directors, employees (whether permanent, fixed term or temporary), consultants, contractors, trainees, casual workers and agency staff, interns, agents, or any other person associated with the Company.

## 2 Understanding and Recognising Bribery and Corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as offering, promising, or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality, and entertainment can be bribes if they are intended to influence a decision.

## 3 Wyatt Carruthers Jebb Ltd's Policy

Wyatt Carruthers Jebb Ltd will not tolerate bribery or corruption in any form.

The Company prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- *To or from any person or company wherever located*, whether a public official or a public body, or a private person or company;
- *By any individual employee*, director, agent, consultant, contractor, or other person or body acting on the Company's behalf;
- *To gain any commercial, contractual, or regulatory advantage* for the firm in any way which is unethical to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit the following is not intended to prohibit the following practices provided they are appropriate, proportionate and re properly recorded:

- Normal hospitality, if it complies with the Company's Corporate Entertainment guidelines of this policy;
- Fast tracking a process which is a process which is available to all on a payment of a fee; and/or
- Providing resources to assist a person or body to decide more efficiently, provided that it is for this purpose only.

Employees should seek advice from a director in cases of uncertainty about how to apply this policy. They should consult with a director if they suspect that a Company employee is engaged in bribery, corruption, fraud or any other unacceptable or unethical conduct

The Company will investigate thoroughly any actual or suspected breach of this policy or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

## 4 Key Risk Areas Explained

### Bribes and kickbacks

Wyatt Carruthers Jebb Ltd prohibits its employees from engaging either directly or indirectly in acts of corruption, and from paying bribes or kickbacks to, or accepting bribes or kickbacks from, public officials and private individuals such as the personnel of companies with which the company does business.

### Facilitation payments

Wyatt Carruthers Jebb Ltd and its employees will not make facilitation payments even if such payments are local practice or custom. The company accepts that refusal to make illicit payments may lead to commercial delays, for example, in the processing of government papers, and that there may be a commercial cost to the company attributable to this policy. If company employees encounter a demand for a facilitation payment, or think they are likely to do so, they should report the situation to a Director without delay in writing stating all fact available to them at the time.

### Clients and Public officials

Bribing or corrupting a client or public official is a serious offence, can carry severe penalties and can cause significant reputational damage. This policy provides detailed guidelines on gifts and hospitality. Approval must be secured in advance in relation to gifts or benefits received from or offered to Clients or public officials.

### Gifts, Hospitality and Expenses

Company employees may not offer to, or accept from, third parties, gifts, hospitality, rewards, benefits, or other incentives that could affect either party's impartiality, influence a business decision or lead to the improper performance of an official duty. Similarly, they may not offer or accept cash donations.

Company employees may offer and accept 'reasonable' and 'proportionate' gifts and entertainment, such as dinner, theatre parties or sporting events. In determining what is 'reasonable' and 'proportionate', employees should consider the value of the gift or benefit, as well as the frequency with which the same or similar gift or benefit is offered.

### Personal conflicts of interest

Company employees must avoid situations or transactions in which their personal interests could conflict or might be seen to conflict with the interests of Wyatt Carruthers Jebb Ltd. This includes acting on any client information gained through their employment with Wyatt Carruthers Jebb Ltd for personal gain; passing such information to a third party; or acting in any way that could be construed as insider trading.

If there is a potential for conflict, the interests of Wyatt Carruthers Jebb Ltd must take priority. Employees must disclose any personal conflict of interest or perceived conflict to their Department Director.

### Charitable donations

As part of its corporate citizenship activities, Wyatt Carruthers Jebb Ltd may support local charities or provide sponsorship, for example, to sporting or cultural events. Any such sponsorship must be transparent and properly documented. Wyatt Carruthers Jebb Ltd will only provide donations to organisations that serve a legitimate public purpose, and which are themselves subject to high standards of transparency and accountability. Appropriate due diligence must be conducted on the proposed recipient charity and a full understanding obtained as to its *bona fides*.

### Political activities

Wyatt Carruthers Jebb Ltd has a policy of strict political neutrality; it does not make donations to any political parties, organisations, or individuals engaged in politics. The company will co-operate with governments and other official bodies in the development of policy and legislation that may affect its legitimate business interests, or where it has specialist expertise.

Employees are entitled to their own political views and activities, but they may not use Company premises or equipment to promote those views or associate their views with those of Wyatt Carruthers Jebb Ltd.

### Business relationships

Wyatt Carruthers Jebb Ltd expects its business Directors to approach issues of bribery and corruption in a manner that is consistent with the principles set out in this policy. This requirement applies to agents, subcontractors, and joint venture Directors. In cases where the company is unable to ensure these standards, it will reconsider the business relationship.

### Suppliers and contractors

Wyatt Carruthers Jebb Ltd will ensure that the procurement procedure for appointing suppliers and contractors is open, fair, and transparent. The selection of contractors will be based on an evaluation of professional merit, and not on personal recommendations.

Wyatt Carruthers Jebb Ltd will communicate its Anti-Bribery and Anti-Corruption policy to its suppliers and contractors, and it will expect them to abide by the principles set out in the policy when working on the company's behalf. If those principles are breached, the company will reserve the right to terminate the contract.

## 5 Accounts and Audits

Company policy requires employees to keep accurate accounts throughout the company's operations. All gratuities, in whatever form, must be recorded.