

Anti - Bribery Policy

It is our policy to conduct all our business in an honest and ethical manner. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. At WildJac we are committed to comply with the Bribery Act 2010 throughout the staffing structure.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, casual workers, agents, contractors, external consultants, and business partners.

What is bribery?

Bribery means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting, or seeking a bribe.

All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your Line Manager or a Director.

Specifically, you must not:

- give or offer any payment, gift, hospitality, or other benefit in the expectation that a business advantage will be received in return, or to reward any business received.
- accept any offer from a third party that you know, or suspect is made with the expectation that we will provide a business advantage for them or anyone else.
- give or offer any payment (sometimes called a facilitation payment) to a government official to facilitate or speed up a routine or necessary procedure.

You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

Gifts and hospitality

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services, however all hospitality activities must be approved by a Director.

A gift or hospitality will not be appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret. Gifts must be given in our name, not your name. Promotional



gifts of low value such as branded pens or items of similar value may be given to or accepted from existing customers, suppliers, and business partners.

Record keeping

You must declare to a director any gifts given or received, a written record of all hospitality or gifts over the value of £10 will be kept on file. You must also submit all expenses claims relating to hospitality, gifts, or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

How to raise a concern

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption, or other breach of this policy has occurred or may occur, you must notify your Line Manager or a Director or report it in accordance with our Whistleblowing Policy as soon as possible.