

# Our Approach to Ethical Business



Further to the introduction of the Bribery Act 2010, UK companies and individuals are now subject to one of the toughest anti-corruption regimes in the world.

These rules apply regardless of where and with whom they are doing business.

Breach of this new law can ultimately result in significant criminal liability for a company and its officers. This can also lead to exclusion from public sector contracts throughout the European Union and in many other countries.

Liability can arise even if any bribery is carried out on a company's behalf by third parties, including its consortium partners, consultants, sub-contractors and agents.

WYG takes a zero tolerance approach towards all unethical business practices, including:

- Bribery
- Excessive corporate hospitality / gifts
- Donations to charitable or political organisations with a view to obtaining an improper advantage
- Facilitation payments
- Fraud

This approach applies to both the offering and receiving of such inducements.

We expect everyone with whom we do business to endeavour to operate towards a standard of best practice.

Unless suitable alternative policies are already in place, WYG's ethical behaviour guidelines should be adhered to in every business transaction entered into by a WYG company.

This is compulsory for all WYG employees and will be a fundamental contractual condition of any agreement with a business partner. Detailed guidance for staff and partners is provided on WYG's intranet or can be requested from [legal@wyg.com](mailto:legal@wyg.com).

As part of this compliance programme, WYG:

- may carry out suitable due diligence and risk assessment on sub-consultants and consortium partners or those whose unethical actions might expose WYG to legal liability;
- may review the conduct of partners to ensure that they act in accordance with WYG procedures (or equivalent or higher standard);
- will seek to contract on terms that allow termination in the event of unethical behaviour;
- will arrange training for all employees and key business partners to promote understanding and compliance with WYG's ethical behaviour procedures;
- will operate a "whistleblowing" procedure where concerns can be raised in good faith without fear of recrimination.

# Our Approach to Ethical Business



It is our moral responsibility to play our part in eradicating improper business practices which ultimately harm those societies which many of our projects seek to improve.

We can all help by maintaining a zero tolerance approach, refusing to engage in any unethical conduct.

A handwritten signature in black ink, appearing to read 'Douglas McCormick'.

**Douglas McCormick**

Chief Executive Officer

Title:	Our Approach to Ethical Business		
Owner:	Company Secretary	Version:	2017/1
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