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## ANTI-BRIBERY POLICY

### Introduction

Whiting Landscape Ltd is committed to implementing and enforcing effective systems to counter bribery. Therefore it is the Companies' policy to conduct all aspects of its business in an honest and ethical manner at all times.

This policy applies to all individuals working for the Company, including anyone providing services to the Company such as consultants, contractors and agents.

### Policy aim

The aim of this policy is to help the Company act in accordance with the Bribery Act 2010 maintain the highest possible standards of business practice and advise individuals of the companies 'zero-tolerance' to bribery.

### The Law

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment. If the Company is found to have taken part in corruption or lacks adequate procedures to prevent Bribery, it could face an unlimited fine and be excluded from tendering for contracts.


### Policy statement


The company will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of their duties.
- Make, or accept, "kickbacks" of any kind.

The company will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties, and show transparency in its dealings.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

Issued By: Laurence Upcott.	<b>Signature:</b> 
Date of Issue: 29 <sup>th</sup> March 2019.	

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- Periodically assess the nature and extent of its exposure to potential risks of bribery on its behalf, by persons associated with it, and act accordingly.

### Definitions

**Bribe** is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties improperly or; with the intention of influencing them in the performance of their duties.

**Hospitality** is the practice of being hospitable. This includes the reception and entertainment of guests and visitors, in the desire to cement good relations and show appreciation, improve image or establish cordial relations. The recipients of hospitality, should not be under the impression that they are under any obligation to confer any benefit. This policy does not prohibit giving and receiving promotional gifts of low value or normal and appropriate hospitality.

**Kickbacks** or facilitation payments are typically small payments made in return for a business favour or advantage.

### Employee Responsibility

It is the responsibility of all employees to prevent and report conduct which has taken place which you suspect is a bribe (or corrupt). Any such incidents should be reported, in confidence, to a Director.

### Non compliance

#### Staff

Failing to observe Company policy may lead to disciplinary action in accordance with the Company's Disciplinary Policy.

### Associated Parties

In the event of a breach of the policy by other organisations, or individuals, the Company will take appropriate action.

### Monitoring Policy

The policy will be monitored on an on-going basis to ensure that it addresses issues effectively and is essential to assess how effective the Company has been to establish control of its obligations. The following will be monitored:

- That all individuals working for the Company are advised of the policy.
- Investigation and assessment of any reported incident or related occurrence.

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- Review procedures and control mechanisms designed to prevent bribery by persons associated with it.

### Reviewing Policy

This policy will be reviewed and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made, by learning from experience.

### Policy Amendments


Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Company Directors to see that all relevant employees receive notice.

### Policy Implementation Notice

This policy has been approved by the Board of Directors and takes effect immediately.

Signed 

Date: 29<sup>th</sup> March 2019.

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