

Policy Statement

John Wade adheres to the Bribery Act 2010 which states it is Company Policy to conduct business in an honest way and without the use of corrupt practices or acts of bribery to obtain an unfair advantage.

We are committed to ensuring compliance to the highest legal and ethical standards which must be reflected in every aspect of the way the Company operates. John Wade strives to ensure that integrity is brought to all company dealings as Bribery and Corruption can harm the Company.

Purpose

The purpose of the Bribery and Corruption Policy is to identify that it is a corporate offence of failure to prevent bribery by anyone working on behalf of John Wade. We will implement adequate procedures to prevent bribery taking place in the workplace.

The Bribery Act 2010 made it a criminal offence to give, promise or offer a bribe, agree to receive or accept a bribe either at home or abroad.

The Bribery Act 2010 increased the maximum penalty for bribery to ten-year imprisonment with an unlimited fine, this was increased in order to promote anti-bribery within businesses.

Scope

Some definitions of bribery and corruption:

- Accepting a gift from a customer or supplier over the value of £50;
- Giving any gift to a customer or supplier, on behalf of John Wade, of any value, without prior approval;
- Accepting an invitation from a customer or supplier without prior authorisation;
- Accepting an invitation for a corporate event for a group of John Wade employees without prior approval;
- Inviting customers or suppliers to an event without prior approval.

What to do if you receive an invitation to a corporate event (UK or abroad) from a customer or supplier:

1. Email details of the event (customer/supplier name, event name, date and time) to your Manager
2. If the invitation received is for a group of John Wade employees, as the recipient of the invitation you should note in your email a list of the employees you intend to take to the event.
3. Your Manager will submit your request to Kurt Bousfield, Managing Director
4. Your Manager will then inform you of the outcome.

Note: All event invitations must be declared. These will be recorded on our business platform to ensure strict compliance with anti-bribery laws. Failure to comply with this policy will result in disciplinary action.

What to do if you receive a gift from a customer or supplier:

1. All gifts must be declared, you should email details to your Manager
2. If you are given a gift under the value of £50, as long as it has been declared, you are able to accept and keep the gift
3. If you value of the gift is over £50, you must hand this to you Manager, the gift will then be distributed back out to the department at Christmas or entered into a Company raffle.

Note: All gifts must be declared. These will be recorded on our business platform to ensure strict compliance with anti-bribery laws. Failure to comply with this policy will result in disciplinary action.

Responsibilities of John Wade

We will identify any risks and prevent any deliberate unethical conduct:

- Prevent bribery and corruption throughout the whole of the organisation, through the Company structure up to and including the highest-level of management.
- Ensure that control measures identified are in place within the Company, maintained and remain effective and reviewed annually to prevent breach of the Policy
- Conduct diligence of existing or prospective employees
- Not provide the provision of gifts (other than gifts sanctioned by the Directors – Hospitality and promotional expenditure) political donations, or demands for facilitation payments
- Provide all recruits terms and conditions of employment including, disciplinary an remuneration
- Provide pre and post contractual agreements to business clients
- Provide the provision of financial and commercial controls which exists throughout the company's accounting function, including external auditing and approval of expenditure or predetermined stages within the contract
- Ensure the provision of transparency of transactions and disclosure of information
- Vigorously enforce the Anti Bribery and Corruption Policy
- Encourage Whistle Blowing or an employee speaking up, procedures exist and are maintained to ensure that individual's confidentiality is upheld and the procedure to be communicated to all company employees
- Ensure that the Anti Bribery and Corruption Policy and associated procedures are communicated to all company employees
- Ensure the provision of information, instruction and supervision of this Policy is maintained.