



## Anti Bribery and Corruption Policy

Wyckham Blackwell Limited is committed to maintaining the highest possible ethical standards in all its business activities and recognises that any involvement in bribery will reflect adversely on its reputation.

Our policy is to prohibit the giving, solicitation or the acceptance of any bribe, or corrupt activity, including tax evasion, whether cash or other inducement to or from any person or company.

In general, the company does not believe that it is appropriate for employees to accept gifts from customers, suppliers or any other person or organisation with which the company has (or might have) business connections. This is because it is important to ensure that no employee acts in any way that is inconsistent with the Company's objectives or with the integrity of the business by accepting a gift in circumstances where it could influence, or be seen to influence that employee's business actions or decision.

This policy does not apply to promotional gifts, i.e. items such as stationery or pens that bear the logos or company name of another organisation (provided that these have no significant value) or normal and appropriate hospitality.

Any employee who receives a gift of any kind from an existing or potential business contact must disclose the fact of the gift, its nature and the identity of the sender to the Managing Director. If the gift is anything other than a small token of appreciation, having no substantial financial value, the employee will be required to return the gift to the sender with a polite note thanking him / her and explaining that it is the company's policy that employees should not receive gifts.

Our aim is to encourage employees to be vigilant and to report any suspicion of bribery or corruption. The prevention, detection and reporting of bribery or corruption is the responsibility of all employees of Wyckham Blackwell Limited. If anyone has any concerns, please report these confidentially to the Managing Director. (Please refer to the Policy on Whistle Blowing).

This policy forms part of the terms and conditions of all employees' contracts of employment and any breach of the policy will be regarded as misconduct leading to disciplinary action up to and including summary dismissal.

3/1/24

Stephen Thompstone Managing Director