

## **11. Anti-Bribery Policy (Bribery Act 2010)**

WL promotes integrity in all business matters with clients and security operatives alike. Our anti-bribery policy follows proper procedures; we aim to help you understand what bribery is, the criminal implications and offences, and appropriate ways to handle bribery.

### **11. 1 Bribery is Illegal**

Bribery is a form of payment or gifting with the intention to obtain or reward something that is done improperly or goes against procedures and policies. It is rare to encounter bribery in the UK, as laws exist to protect people and businesses against this, however, WL is committed to ensuring our workers are briefed and maintain a high standard of professionalism recognized by relevant authorities and clients alike.

### **11.2 What you should do if faced with bribery?**

Know and understand the ulterior motives being presented. Assess the situation if you understand an improper exchange is occurring and refuse to be part of this when working with and under WL Risk Management. We must ensure an ethical approach to complex situations.

Your response:

- i. Refuse any gifts or payments presented in an exchange for your compliance or silence for something they (briber) intend to do that may be detrimental to the safety of patrons/clients you are tasked to protect.
- ii. Report this through chain of command, and allow WLs management team to assess any further implications.

### **11.3 The Six Principles and Procedures**

WL ensures your safety by accommodating the best ways to continue building positive networks. That includes following through with all legal obligations. The six principles serve as guidance and understanding for our workers and the company's protection;

*Proportionate Principle*

*Top Level Commitment*

*Risk Assessment*

*Due Diligence*

*Communications*

*Monitoring and Review*

Not all bribes are alike, hence, not all consequences of it measure the same. However great or small, the scale of bribery within the company must be made aware and how we deal with it. This prevents further damage and loss to both workers and the company.

### 11.3.1. Procedures

As stated in **11.2.i**, your response to this bribery is crucial to your integrity under WLs company banner. If in the case that bribery was offered and a WL worker or representative accepts gifts, payment or promise of something in exchange for compliance or silence, which may put clients and patrons in especially threatening situations, WL will act upon immediate action to investigate the scale of bribery and may call upon the appropriate legal action. This can include hefty fines, a termination of contract with no possible renewals and police investigation into the matter.

Our response;

- i. An assessment of the risks and scale of action needed.
- ii. Low risk cases will be dealt with appropriate reminders of our policy and a general warning issued either written or verbally by senior management.
- iii. High risk cases will require thorough investigation. In this case, the appropriate procedures will be conducted with a written warning and detailed measures.

### 11.3.2 Management Commitment

WL ensures commitment and compliance in following the laws and procedures published in the Anti-Bribery Act 2010. The company handles all necessary engagements professionally and thoroughly. WL does not support any bribery within its construct, and will respond to any possible case with integrity.

In the event of management involvement in a bribery case, the remaining management must oversee and investigate in due diligence.

### 11.3.3 Risk Assessment

As described in **11.3.1.i**, WL management will need to conduct an assessment to gage the appropriate response to any suspicious bribery activity. The company will conduct assessments either internally or with external involvement.

#### 11. 3.3. a) External Risks

Commonly encountered external risks are sectored in five groups; country, sectoral, transaction, business opportunity and business partnership.

**3.1 Country risk:** high level of corruption and an absence of effective actions on anti-bribery legislation. *“A failure of the foreign government, media, local business community and civil society in promoting transparent procurement and investment policies.”*

**3.2 Sectoral risk:** *“some sectors are higher risk than others. Higher risk sectors include the extractive industries and the large scale infrastructure sector.”*

**3.3 Transaction risk:** certain transaction risks may be higher than the other. These are defined as or in part to charitable or political contributions, licenses and permits transactions that involve public procurement.

**3.4 Business opportunity risk:** possibility that may arise in high value projects. These involve many contractors or intermediaries, or projects which are not taken at market prices, or ones that do not have a clear legitimate objective.

**3.5 Business partnership risk:** “certain relationships may involve higher risk, for example, the use of intermediaries in transactions with foreign public officials; consortia or joint venture partners. Any relationships with politically exposed persons where the proposed business relationship involves, or is linked to, a prominent public official. “

### 11.3.3. b) Internal Risks

As such, external risks are assessed to determine the appropriate action needed, however internal factors are just as important. These commonly encountered internal factors include:

- Absence in employee training, skills and knowledge.
- Bonus culture that rewards excessive risk taking.
- Lack of clarity in the organisation policies and procedures. These are inducted within the hospitality and promotional expenses, and political or charitable contributions.
- Lack of clear financial controls – regular checks of financial statements that is essential to cash management and budgeting which helps prevent any fraud or theft.
- Lack of a clear anti-bribery message from management.

### 11.3.4 Due Diligence

#### ***What is due diligence?***

In the anti-bribery context, it is the procedure of identifying risks and mitigating proportionate measures. It is a principle designed to help prevent persons from associating with any form of bribery.

#### **4.1 Procedures**

Any worker under WLs sub contract agreement and WL management are subject to follow through with anti-bribery policies in place.

***Know who you're dealing with.*** Delegating work through intermediaries (third parties) is a higher risk and requires due diligence.

***Before committing, assess all factors.*** Risk mitigation is essential to identifying who and what you will be signing on.

***Practicalities.*** In higher risk situations, a company exercises due diligence by processing applications and assessing a potential workers information. Research and interviews are conducted to gauge persons of interest. In lower risk situations, a company can choose not to carry out high risk procedures.

***Staying informed.*** It is management duty to inform and assess all workers, as it is required workers understand the severity of associating with any sort of bribery.

### **11.3.5 Communication (including training)**

Principle 5 Communication, is ensuring the company and its associates are aware of and understand policies and procedures. Training is by way of teaching these policies and procedures so that workers and management alike are proactive in preventing high risk situations, or knowing how to deal with it.

#### ***5.1 Internal communication***

An internal communication allows open yet confidential matters to be discussed and assuring. These could be raising concerns about bribery of another worker or management. WL supports integrity in business, and complies with procedures of this Act.

#### ***5.2 External communication***

An open statement policy or codes of conduct that is accessible and viewable. These are available on WLs website, by request of procurement and tendering. We are committed to anti-bribery procedures and principles and issue this as a means of communicating our position – that we do not support bribery of any form.

#### **5.3 Training**

For new or independent workers, an induction process requires main points and policies to be made aware of working with WL Risk Management. Training may vary depending on low to high risk factors.

### **11.3.6 Monitoring and review**

Policies may change at any time under proper procedure and review by management.

Date: 06/27/2023

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