



Anti-bribery and corruption policy

Wymark Ltd is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The Company will not tolerate bribery or corruption in any form.

This document sets out the firm's policy in relation to bribery and corruption. The policy applies strictly to all employees, directors, consultants, contractors or any person or body associated with Wymark Ltd.

Bribery and corruption are understood as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so. So this could cover seeking to influence a decision-maker by giving some kind of extra benefit to that decision maker rather than by what can legitimately be offered as part of a tender process. Bribery could include not just cash but gifts, hospitality and entertainment.

Wymark prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- *to or from* any person or company wherever located, whether a public official or public body, or a private person or company;
- *by* any individual employee, director, agent, consultant, contractor or other person or body acting on the firm's behalf;
- *in order to* gain any commercial, contractual, or regulatory advantage for the firm in any way which is unethical or *to* gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- normal hospitality;
- fast tracking a process which is available to all on the payment of a fee; and/or
- providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only.

If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to a Director. If necessary, guidance should also be sought from the Company's solicitor.

The firm will investigate thoroughly any actual or suspected breach of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in dismissal.

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the Company. Employees have a duty to report any suspect activity or conduct which is proposed or has taken place which could be bribery or corruption.

Any such incidents should be reported to the Managing Director.

M. Dane