

## **Anti-Corruption and Bribery Policy**

It is the policy of Industrial Water Jetting Systems Ltd to conduct all our business in an honest and ethical manner.

The company takes a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption and remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

The purpose of this policy is to:

- (a) set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- (b) Provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment

If we are found to have taken part in corruption, the company could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation.

We have identified that the following are risks for our business as set out in Schedule 1 attached.

Where a risk is identified, due diligence proportionate to that risk will be undertaken by the Company dependent upon where the relevant risk arises.

In this policy, third party means any individual or organisation we encounter during our work, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

### **WHO IS COVERED BY THE POLICY?**

This policy applies to all individuals working at all levels and grades, including directors, senior managers, officers, employees (whether permanent, fixed term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located.

### **WHAT IS BRIBERY?**

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

### **GIFTS AND HOSPITALITY**

This policy does not prohibit reasonable and proportionate gifts or hospitality (given and received), or promotional or other business expenditure provided to and from third parties provided always that it is a normal and appropriate part of our business practices and seeks only to improve the image of our organisation, to better present our services or to establish cordial relations with third parties.

The giving or receipt of gifts is not prohibited, if the following requirements are met:

- it is not made with the intention of influencing a third party to obtain or retain business, or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits.
- it complies with local law.
  
- it is given in our name, not in your name.
- it does not include cash or a cash equivalent (such as gift certificates or vouchers).
- it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time.
- considering the reason for the gift, it is of an appropriate type and value and given at an appropriate time.
- it is given openly, not secretly; and
- gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of the Compliance Director.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. If there is any doubt as to what is acceptable, the matter should be discussed with the Compliance Director prior to proceeding.

The test to be applied is whether in all the circumstances the gift or hospitality, promotional or other business expenditure is reasonable and proportionate in all the circumstances.

The intention behind the gift, hospitality, promotional or business expenditure should always be considered. The intention must be solely to improve the image of our organisation, or better present our services, or to establish cordial relations with third parties.

#### **WHAT IS NOT ACCEPTABLE?**

It is not acceptable to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that business or a business advantage will be retained or received, or to reward business or a business advantage already given.
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.
- accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain a commercial, contractual or personal advantage for them.
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a commercial, contractual or personal advantage will be provided by us in return.
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- Engage in any activity that might lead to a breach of this policy.

## **FACILITATION PAYMENTS AND KICKBACKS**

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK but are common in some other jurisdictions.

If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Compliance Director.

Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

## **DONATIONS**

We do not make contributions to political parties.

## **INDIVIDUAL RESPONSIBILITIES**

All employees must be aware of this policy and managers prepared to discuss and address any matter that may breach any term within this policy. You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Compliance Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

**Example:** A client or potential client offers you something to gain a commercial, contractual personal advantage with us, or indicates to you that a gift or payment is required to secure their business. Further "red flags" that may indicate bribery or corruption are set out in the Schedule 2 attached.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

## **RECORD-KEEPING**

We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

You must declare and keep a written record of all hospitality, or gifts promotional or business expenditure accepted or offered, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, or gifts promotional or business expenditure incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

## **HOW TO RAISE A CONCERN**

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with the Compliance Director. Concerns should be reported by following the procedure set out in our Whistleblowing Policy.

## **WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION**

It is important that you inform the Compliance Director as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

## **PROTECTION**

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

## **WHO IS RESPONSIBLE FOR THE POLICY?**

The Board of Directors hold overall responsibility for ensuring this policy complies with our legal and ethical obligations, and all those under our control comply with it.

The Managing Director has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them is made aware of and understand this policy and are given adequate and regular training on it.

## **MONITORING AND REVIEW**

The Managing Director will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Workers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Managing Manager. In addition to this, the HR Manager will regularly request details of any gifts from any employee and will regularly check expense claims to identify if gifts have been purchased and claimed as an expense.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

## **SCHEDULE 1**

### **EXTERNAL RISK FACTORS**

#### **1 TRANSACTION RISK**

The nature of our business in providing a range of wastewater industry services and environmental services in the UK and abroad necessarily involves securing licences, permits approvals and permissions.

#### **2 BUSINESS OPPORTUNITY RISK**

The nature of the products we deal with and the services we provide for and on behalf of our clients in the wastewater industry sector and environmental sector.

#### **3 BUSINESS PARTNERSHIP RISK**

The nature of our business in providing wastewater industry services and environmental services in the UK and abroad necessarily involves work with and promoting business relationships with foreign public officials.

**SCHEDULE 2**

**POTENTIAL RISK SCENARIOS: "RED FLAGS"**

The following is a list of possible red flags that may arise during you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us, you must report them promptly to a Director:

- 1 you become aware that a third party engages in, or has been accused of engaging in, improper business practices.
- 2 you learn that a third party has a reputation for paying bribes, or requiring that bribes be paid to them, or has a reputation for having a "special relationship" with UK or Foreign government officials.
- 3 a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us or carrying out a government function or process for us.
- 4 a third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
- 5 a third-party request that payment is made to a country or geographic location different from where the third party resides or conducts business.
- 6 a third party requests an unexpected additional fee or commission to "facilitate" a service.
- 7 a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations, provision of services.
- 8 a third-party request that a payment is made to "overlook" potential legal violations.
- 9 a third-party request that you provide employment or some other advantage to a friend or relative.
- 10 you receive an invoice from a third party that appears to be non-standard or customised.
- 11 a third party insists on the use of side letters or refuses to put terms agreed in writing.
- 12 you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided.
- 13 a third party requests or requires the use of an agent, intermediary, consultant or supplier that is not typically used by or known to us.
- 14 you are offered an unusually generous gift or offered lavish hospitality by a third party

Signed



Christopher Stewart  
Managing Director

05th October 2021