

# Bribery Policy Statement

The policy of GW Highways Ltd is to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to prevent bribery and corruption.

## **Who is covered by the policy?**

This policy applies to all individuals working at all levels and grades, including, directors, employees (whether permanent or temporary), consultants, contractors, and any other person providing services to us.

## **What is a bribe?**

A bribe is a financial or other advantage offered or given:

- to anyone to persuade them to or reward them for performing their duties improperly
- to any public official with the intention of influencing the official in the performance of his duties.

## **Gifts and Hospitality**

This policy does not prohibit giving and receiving promotional gifts of low value and normal & appropriate hospitality. We maintain a register of gifts and hospitality to monitor appropriate levels, However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with GW Highways Ltd's ethics policy in respect of gifts and hospitality. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his or her duties.

## **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.
- Kickbacks are typically payments made in return for a business favour or advantage. All employees 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 of any kind to political parties and no charitable donations will be made for the purpose of gaining any commercial advantage.

## **Record Keeping**

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

- All expense claims relating to hospitality, gifts or expenses incurred for third parties must be submitted in accordance with our expenses policy and record the reason for the expenditure.

- All accounts, invoices, other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness.

No “off the record” accounts must be kept facilitating or conceal improper payments.

### Raising Concerns

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken. Monitoring The effectiveness of this policy will be regularly reviewed by the Directors. Internal control systems and procedures will be subject to audit under the internal audit process. It is the responsibility of the Directors of the company to ensure this policy is understood and upheld.

Policy Authorised By



David Gibbins, Director  
POL010 Rev C  
07/03/2024



Luke Wenham, Director

POL009 Rev C Date: 27/03/2025

