



Ward & Scott Associates Ltd

Code of Ethical Conduct Policy

This Code of Conduct has been approved by the Board of Directors of **Ward & Scott Associates Ltd** and applies to all businesses and to all staff (permanent, temporary or on contract) engaged to work within or on behalf of the Company. It applies in all jurisdictions in which the Company operates regardless of local laws or culture:

- Staff must not offer or make any bribe, unorthodox or unauthorised payment or inducement of any kind to anyone.
- Staff must not solicit business by offering any bribe, unorthodox or unofficial personal payment to customers or potential customers.
- Staff must not accept any kind of bribe, unorthodox or unusual payment or inducement that would not be authorised by Ward & Scott Associates Ltd in the ordinary course of business.
- Staff must clearly refuse any bribe or unorthodox payment and must do so in a manner that can lead to no misunderstanding or false expectation; and to report any such offers to line management or Director.
- Staff must report any breaches of this policy or of any applicable law even if by doing so they have to disclose their own wrongdoing, acting with integrity at all times.
- Ward & Scott Associates Ltd requires managers to maintain a working environment where staff can make reports of breaches of this policy in confidence and without fear of reprisals.
- Ward & Scott Associates Ltd expects its business partners, suppliers to act with integrity and without thought or actions involving bribery and corruption and will, where appropriate, include clauses to this effect in contracts offered to any such third parties.
- Ward & Scott Associates Ltd will actively investigate all reported allegations of fraud, corruption or abuse of position for personal gain involving the Company and its staff, wherever they might occur.
- Ward & Scott Associates Ltd undertakes that, except for knowingly reporting false accusations, every employee may report allegations without fear of retaliation.
- Ward & Scott Associates Ltd and its staff will not make direct or indirect contributions to political parties, organisations or individuals engaged in politics, as a way of obtaining advantage in business transactions. Ward & Scott Associates Ltd will publicly disclose all its political contributions.
- Ward & Scott Associates Ltd will ensure that charitable contributions and sponsorships are not used as a subterfuge for bribery. Ward & Scott Associates Ltd will publicly disclose all its charitable contributions and sponsorships.
- Compliance with this Ethical Code of Conduct (and the policy that it forms an integral part of) is mandatory for all staff (including Directors) and Ward & Scott Associates Ltd will apply appropriate sanctions for violations of this Code and the policy.
- Ward & Scott Associates Ltd will not channel improper payments through agents or other intermediaries.
- Ward & Scott Associates Ltd undertakes properly documented due diligence before appointing agents and other intermediaries.
- All agreements with agents and intermediaries require the prior approval of senior management.
- Compensation paid to agents and other intermediaries must be appropriate and justifiable remuneration for legitimate services rendered.



- Agents and other intermediaries must contractually agree to comply with this policy and are provided with appropriate advice and documentation explaining this obligation.
- Ward & Scott Associates Ltd contractually requires its agents and other intermediaries to keep proper books and records available for inspection by the Company, auditors or investigating authorities.
- Ward & Scott Associates Ltd monitors the conduct of its agents and other intermediaries and has a right of termination in the event that they pay bribes or act in a manner inconsistent with this policy.
- With regards to suppliers, Ward & Scott Associates Ltd conducts its procurement practices in a fair and transparent manner.
- Ward & Scott Associates Ltd avoids dealing with suppliers known or reasonably suspected to be paying bribes. The Company undertakes due diligence, as appropriate, in evaluating prospective suppliers to ensure that they have effective anti-bribery policies.
- Ward & Scott Associates Ltd makes this policy known to suppliers and requires their acceptance and adherence to this policy.
- Ward & Scott Associates Ltd monitors significant suppliers as part of its regular review of relationships with them and has a right of termination in the event that they pay bribes or act in a manner inconsistent with this policy.
- Ward & Scott Associates Ltd makes it clear that no employee will suffer demotion, penalty, or other adverse consequences for refusing to pay bribes, even if such refusal may result in the Company losing business.
- Ward & Scott Associates Ltd has established and maintains an effective system of internal controls to counter bribery, comprising financial and organisational checks and balances over the Company's accounting and record keeping practices and other business processes related to this policy.
- Ward & Scott Associates Ltd has established feedback mechanisms and other internal processes supporting the continuous improvement of this policy. Senior management of the Company will monitor the policy and periodically review the policy's suitability, adequacy and effectiveness, and implement improvements as appropriate.
- Ward & Scott Associates Ltd requires all staff to be honest with others and ourselves. We meet the highest ethical standards in all business dealings. We do what we say we will do. We accept responsibility and hold ourselves accountable for our work and our actions.
- Ward & Scott Associates Ltd value and demonstrate respect for the uniqueness of individuals and the varied perspectives and talents they provide. We embrace a diversity of people, ideas, talents and experiences.
- Ward & Scott Associates Ltd provides equal employment opportunities and treats applicants and employees without bias. It is our policy that no one should ever be subject to discrimination.
- Ward & Scott Associates Ltd seek new opportunities. We use our creativity to find unexpected and practical ways to solve problems. Our experience and perseverance enable us to overcome challenges and deliver value.
- Ward & Scott Associates Ltd place the highest priority on the health and safety of our workforce and protection of our assets and the environment.
- Ward & Scott Associates Ltd prohibits the use, possession, distribution, purchase or sale of controlled substances on the premises while conducting business for the Company or while operating Company equipment.



- The use, possession, distribution, purchase or sale of alcohol by any person while on Ward & Scott Associates Ltd premises, or while operating Company equipment, is prohibited unless prior permission has been obtained from appropriate Company management. In certain circumstances, such as official Company events, use of alcohol may be authorized, as long as permission is received in advance from appropriate Operating Company or Department management.
- Ward & Scott Associates Ltd prohibits actual or threatened violence against co-workers, visitors or anyone else who is either on the premises/sites or has contact with employees in the course of their duties. It is our policy that no one should be treated unkindly.
- Ward & Scott Associates Ltd, expect one another to act in the best interests of the Company. This means that business decisions should be made free from any conflict of interest. They should appear impartial. We must make our decisions based on sound business reasoning.
- Ward & Scott Associates Ltd follows Company policies and guidelines for handling personal data. Personal data is information that can identify an individual, including employees, directors, shareholders, customers and anyone else with whom Ward & Scott Associates Ltd does business. Personal data is an important asset, and the way we handle this data is critical to our success, demonstrates respect and promotes trust.
- Ward & Scott Associates Ltd ensures all employees follow the Company's retention policy for all records and other forms of information. Company records must be kept for a set period required by the Company's retention schedule.
- Ward & Scott Associates Ltd are committed to excellence in everything we do, and we strive to continually improve. We are passionate about achieving results that exceed expectations – our own and those of others. We drive for results with energy and a sense of urgency.

Signed : RICKI SCOTT - Managing Director

Date : 01.04.2021