



wellwisegroup

## Wellwise Group Code of Ethics Policy

Wellwise has built its organisation around ethical business practices and aim to operate with the highest levels of integrity at all times. Any business that is conducted for and by the Wellwise Group should be done so in accordance with the guidance given in this policy document. Any deviation should be reported immediately and will be met with support and assistance from the Wellwise Group management team.

### Ethical Dealings

All parties conducting business with and for the Wellwise Group must do so in an ethical and honest way (see definitions at the end of this document). Wellwise will aim to treat all supplier and client business dealings with integrity and fairness basing decision making on objective criteria such as service quality, price, reliability, ability to deliver required standards and integrity. In keeping with this giving or receiving bribes / facilitation payments etc. is prohibited.

### Gifts / Bribery / Hospitality

Wellwise Group employees and contractors are requested to use good judgement when giving or receiving business gifts and hospitality. They should never be used to influence the business decisions of others and vice versa. Business should be conducted in compliance with local laws and customs. Bribery is illegal and exposes the company, and its people to harsh criminal and civil penalties.

It should not be assumed a practice is acceptable just because others do it that way. Further advice should be sought when there is any uncertainty with the above.

Hospitality and gifts can take many forms, including meals, hotels, transportation, tickets to sporting events, leisure activities, sponsorships etc. They must never be provided for an improper purpose. They can be construed as an attempt to unduly influence someone and must therefore only be provided with the following guidelines:-

- Reasonable in value, quantity and frequency
- Provided only to recipients involved in company business (i.e. not to spouses or children etc.)
- Of a nature which is relevant to the business, culture and circumstances.
- Directly related to the Wellwise Groups business interest.
- Consistent with the policy of the recipient and their Company also.
- Permitted under relevant law
- Receipts for expenditure to be provided to the accounts manager who will account for them in the correct manner.

### Financial Reporting

No entries shall be made into the company's book of accounts, or in supporting documents which inaccurately or improperly describe any transactions. Wellwise company accounts and records are prepared accurately and honestly by our internal accounts team and external accountants. These are supported by enough documentation to provide an auditable and traceable record for complete transparency.

Anyone giving or receiving payment through the Wellwise Group must provide a full paper trail (receipts etc.) for their services – where this is inadequate monies owed could be delayed or even withheld.

## Facilitation Payments

A Facilitation payment is seen as a form of bribe under the Bribery Act (UK). They are illegal and forbidden. The best way to reduce circumstances where demands for such payments exist:

- Report any instances directly and openly to the Managing Director / QHSE advisor.
- Plan ahead to avoid getting into a position where a facilitation payment may be requested from you.
- Do not use a third party to make an improper payment on the Company's behalf.

## Charitable and Political Contributions

Charitable Contributions are donations of money or anything of value to support a charitable cause without any acceptance of a business return. All Charitable donations will be first approved by the Wellwise Group Managing Director.

Political Contributions are donations of money or anything of value to support a political cause, party or candidate. As political contributions are vulnerable to abuse, NO political contributions may be made with Wellwise Group funds or property.

## Confidential Information / Intellectual property

Anyone receiving information from the Wellwise Group should treat this confidentially unless informed otherwise. Distributing Wellwise Groups intellectual property is strictly forbidden. Under the Wellwise Group data protection policy any information we receive will be treated in accordance with applicable laws adhering to retention periods where necessary.

## How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice that may or may not breach this policy as soon as possible. It must be stressed that all concerns raised to the Wellwise Group will be dealt with in a fair and ethical manner as to uphold the values of our company. Wellwise encourage transparency in all of our business transactions to ensure we can support anyone raising genuine concerns in good faith under this policy regardless of the outcome.

## Disciplinary Action

Any Wellwise Group contractor or employee who is found in violation of the above policy shall be subject to applicable lawful disciplinary action.

### *Definitions;*

- "Anything of value" is broadly defined and includes anything (monetary and non-monetary) that provides a benefit. For example this can include gifts, personal services, entertainment, employment, favours, inside information, charitable or political donations.
- "Bribery" will be defined in both contexts as receiving or offering (including attempted) anything of value for the purpose of obtaining or retaining a business advantage.
- "Ethical" is defined as being in accordance with rules, standards, best practice or even laws. It also pertains to dealing with morals and principals of morality.
- "Honest" means honourable in principals, intentions and actions (upright and fair).
- "Facilitation Payment" is seen as a type of bribe under the UK Bribery Act. A common example is where a government official is given money or goods to perform (or speed up the performance of) an existing duty.
- "UK Bribery Act (latest amendment)" is the legislation that Wellwise aim to adhere to and use clarify any disputes.
- "Foreign Corrupt Practices Act (latest amendment)" is the US law applicable