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|  | NAME | <u>Anti-Bribery Policy</u> |
| | REF | PS-003-WB-UED |
| | ISSUE DATE | 20//11/2024 |
| | REVISION No | 2 |
| | PREPARE BY: | SM |
| | APPROVE | RM |

Policy Statement

At WestBank Group, we prioritise doing what is right over what is easy, both for our people and our clients. This commitment sets us apart and drives our decision-making process.

Our anti-bribery and corruption policy outlines clear expectations for our partners, employees, customers and contractors. It details the necessary actions to prevent bribery and how to report any concerns or suspicious activities.

We are fully dedicated to preventing bribery and corruption, maintaining a zero-tolerance stance toward any actions that could violate relevant anti-bribery and corruption laws and regulations in the jurisdictions where we operate, including the UK Bribery Act 2010.

Purpose

This policy is designed to inform all employees and stakeholders about our firm stance against bribery and our commitment to conducting business at WestBank Group in a fair, professional, and legal way.

Key prohibitions and requirements

Our Anti-bribery and corruption statement sets out the prohibitions and requirements which must be adhered to.

The key areas are:

It is expressly prohibited to engage in bribery either directly or via a third party.

Bribery is defined as:


- offering, promising, or giving, requesting, seeking, or accepting anything of value, or any other advantage
- to improperly influence a business decision or any other act, inaction, or decision by any person

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.

The organisation will ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

Gifts and hospitality

We understand that giving and receiving gifts and hospitality, when nothing is expected in return, can help build positive relationships with third parties, as long as it is reasonable and properly documented. These actions are not considered bribery and do not violate this policy.

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Gifts include, (such as flowers, vouchers, food, drink, or event tickets not used in a business context), given or received as a gesture of friendship or appreciation.

Hospitality refers to entertainment, meals, or event tickets (when used in a business context) given or received to establish or strengthen relationships. Hospitality becomes a gift if the host is not present.

present.

No employee or anyone working on our behalf should give gifts or offer hospitality to any third party related to our business without prior written approval from **Human Resources Department or your line manager**. Similarly, no employee or representative should accept gifts or hospitality without prior written approval from **Human Resources Department or your line manager**.

Each instance of giving or receiving gifts or hospitality will be documented on the relevant register by HR. The register will be monitored annually.

Prevention of bribery and corruption

WestBank Group takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact **Human Resources Department or your line manager** so that action can be taken if considered necessary. You may be asked to give a written account of events.

If you, as an employee or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to **Human Resources Department or your line manager**. You may be asked to give a written account of events.

As laws and regulations change, this policy will be reviewed, and the company reserves the right to amend it without prior notice.

Andrew Reeks
Operations Director

20/11/2024

Signature

