

W39 services

Solutions for Property Managers

W39 Group's Anti-Bribery and Corruption Policy

1. Policy Statement

The W39 Group ("W39") is committed to doing business lawfully, ethically and with integrity, no matter who we deal with or where we operate. This means that W39 will never tolerate instances of bribery and/corruption within our organisation and that, as an employee of W39, you must never, directly or indirectly, engage in corrupt dealings with any other person or organisation. This policy explains what you need to know and what you need to do to ensure that, in all of your dealings as a representative of W39, you are compliant with applicable laws on anti- bribery and corruption.

2. Policy Owner

The Group Policy owner for this policy is Kealan Turley.

3. Policy Compliance is Mandatory

This policy applies to all W39 employees operating in Ireland. It also applies to all third parties acting on behalf of W39 including secondees, advisors, agency workers, contractors and other companies.

4. Your Responsibility

I ask you all to take the time to read this Policy carefully and apply it to your role. If you have any questions about how to apply this Policy in practice, please ask, use the avenues outlined in this Policy. If for any reason you believe that the Policy is not being followed, I encourage you to speak up and follow the procedures outlined. W39 values employees who raise concerns in good faith and will not tolerate retaliation.

We must:

- Read, understand and comply with this Policy;
- Seek advice if we are unsure how to apply this Policy within our work; and
- Raise a concern if we believe or suspect that non-compliance with this Policy has occurred, or may occur in the future.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for W39. W39 expects all employees and associated persons to avoid any activity that might lead to, or suggest, a breach of this Policy.

5. Applicable Laws

We endeavour at all times to act in a socially responsible manner, within the laws, customs and appropriate traditions of the countries in which we operate, and do what we can to contribute in a responsible manner to the development of communities. Where differences

exist between the standard of the law or regulations and the requirements of this Policy, the higher standard will be applied. Management with responsibility for operations are expected to ensure that our business processes are in compliance with the law.

We are expected to adhere strictly to relevant laws in relation to bribery and corruption including the Criminal Justice (Corruption Offences) Act 2018, the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010, as amended, the Protected Disclosures Act 2014 and the Proceeds of Crime Act 1996.

Great consideration should be given to consulting with your line manager, or Kealan Turley to ensure compliance with all applicable laws.

This Policy will be updated on a periodic basis to reflect legislative changes and when necessary, to address customs and laws of other countries where we do business but it will never compromise the Company's commitment to lawful, honest and fair dealings with our customers, suppliers, employees and other stakeholders.

6. Policy Detail - What do I need to know or do?

This policy explains how to avoid bribery and corruption by explaining what it is and by giving you information and practical examples of what you can or cannot do.

What is a bribe and what is corruption?

A bribe is intended to get a person to do or not to something they would not otherwise do or to do something differently e.g. more quickly, than they would otherwise have done. Bribery can be done by you, by W39 or by getting someone else to do it. Equally, bribery can be committed by a third party trying to influence you in the same way.

Corruption is when you use your role or power to pay, or give a gift or offer hospitality, to an employee or third party, including public officials, to get them to do (or not do), to delay (or to expedite) or to do differently, something for you or W39. Again, corruption can equally occur when a third party attempts to influence you in the same way.

Bribery and corruption are against the law. You are committing bribery when you:

- promise, offer or give a bribe (financial or otherwise), or
- request or agree to receive, or actually receive, a bribe (financial or otherwise).

What counts as a gift and what constitutes corporate hospitality?

A gift is anything of any value which is offered, promised or given and includes any present or token of gratitude such as food, flowers, clothes, electronic items or alcohol. Gifts also include benefits in kind such as goods or use of services or facilities provided to you free of charge or at a reduced rate (car hire, holiday home, interest free loan, credit, discounted goods or services etc).

Corporate hospitality includes any party, drinks, services, meal, tickets or access to a sporting, music or entertainment event and includes payment for travel and accommodation expenses. This policy covers all gifts and hospitality given or received from customers, suppliers, public officials in Ireland and overseas or anyone else.

How do I know what I can give or receive?

W39 does not permit you to accept any bribe however you may give or accept certain reasonable gifts and offers of corporate hospitality. The giving and receiving of small gifts and the offering of, and participation in, corporate hospitality is part of building positive business relationships. You must however, be aware of the boundaries between positive interaction between businesses and the risk of bribery and personal gain.

You should carefully consider any offer of gifts or corporate hospitality from any person or organisation with whom W39 has, or may have, dealings. Anything you are offered, or promised, may be, or may be seen, as an attempt to improperly influence your judgment. Any gift or hospitality accepted must not create the expectation of special treatment toward the donor. You should not accept hospitality or gifts frequently from one source as this could appear to influence your business impartiality. It is important to assess the value and appropriateness of a gift or the hospitality offered. The circumstances and timing of the giving or receiving and its appropriateness to the business relationship in question and the value of the gift or hospitality will determine whether or not it is acceptable. Do not be embarrassed to turn down any inappropriate gift or corporate hospitality.

What do I do if I suspect a bribe has been given or received?

If you are offered any money, hospitality or gift which you suspect may be a bribe or you are in any doubt as to the appropriateness of any gift or an offer of corporate hospitality that you wish to give you must speak to your line manager or to Kealan Turley before giving or receiving any such incentive. If you suspect that bribery or corruption is occurring or has occurred at W39, you must immediately report it to Kealan Turley.

What do I need to know about public officials?

You must never attempt to bribe a public official in Ireland or if you are engaged in work for the Group in other territories.

You should not offer any gifts to public officials whether in Ireland or if you are engaged in work for the Group in other territories.

You may not make 'facilitation payments' (payments which are made to bypass or speed up official processes or for officials to show favour to W39) to any third parties or public bodies to assist W39's operational or strategic plans. No such payments should ever be made by third parties on W39's behalf and this is a contractual requirement for all contracts with contractors, agents and other W39 representatives.

7. Policy breach and consequences

If you do not follow this policy, it may become a disciplinary matter. In some instances, failure to follow this policy will be a criminal offence attracting a fine and/or custodial sentence. In addition, failing to comply with this policy could also mean a substantial fine, invalid contracts, damages claims, negative press and wasted management time for W39 Group.