04 Anti-Bribery and Anti-Corruption

Version 1.0

Scope: WCA directors, personnel, associates and subcontractors, as applicable to their work.

Purpose

Prevent bribery and improper influence in commercial and public-sector engagements.

Policy commitment

WCA prohibits bribes, kickbacks, facilitation payments and improper gifts, including through intermediaries, consistent with the UK Bribery Act 2010.

Implementation

Conduct proportionate due diligence on agents and partners; document commissions, gifts and hospitality; require director approval for sensitive expenditure. Maintain accurate records and prohibit payments intended to influence procurement decisions.

Reporting and accountability

Report suspected misconduct promptly; suspend questionable transactions, preserve evidence and obtain independent advice where needed. Protect good-faith reporters and take proportionate corrective action.