

## BRIBERY AND CORRUPTION POLICY & PROCEDURES

Wiehag GmbH  
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4950 Altheim  
Austria

and

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London  
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UK

both named as WIEHAG in the following.

### General Statement

The Company has a reputation for its high standards of openness, honesty and accountability. It is essential that any concerns you may suspect which show serious malpractice or wrongdoing within the organization are aired. It is in our interest to ensure malpractice/wrongdoing does not occur.

A policy and procedure have been created to set out the Company's position on any form of bribery and corruption.

The policy and procedure are intended to conform to the guidance in Part 12 of the Antiterrorism, Crime and Security Act 2001 (ATCS) which includes bribery and corruption.

Note that the policy and procedure is not incorporated by reference into your Contract of Employment.

### 1. Bribery & Corruption Policy

Conflicts of loyalty or interest

- 1.1 This policy applies to all permanent and short-term employees of WIEHAG. It also applies to secondees, external consultants, contractors and agency personnel whilst at WIEHAG.
- 1.2 It is forbidden for any employers working for or associated with WIEHAG (see 1.1) to offer, promise, or pay anything of value to another party/s which may influence or reward that person/s as a result of their actions. "Anything of value" may include, bribes, kickbacks or any other reward/s.
- 1.3 The use of subcontracts, purchase orders or consultancy agreements, as a means to channelling payments to officials/persons are also prohibited, you should raise these with your managers.
- 1.4 Expenses will only be paid in relation to costs uncured in the course of legitimate business. It is a requirement that any expenditure on business entertaining or any other external payment be supported by receipts. The claimant should further declare why any business payment was made, or entertainment given.

- 1.5 WIEHAG only accepts or provides gifts or entertainment for business purposes only. Gifts or entertaining should not be given or received on a level influencing business which may not have otherwise been undertaken. It is important to note what is considered appropriate varies from country to country and therefore local managers/heads of staff should put in place rules to cover the giving and receiving of gifts or entertainment reflecting local customs ensuring they are approved by their immediate manager.
- 1.6 In raising a malpractice/wrongdoing concern, only WIEHAG investigating the malpractice/wrongdoing concern will know your identity. There may be circumstances, however, in which we may be required to reveal your identity. If this is the case, we will take all reasonable steps to ensure that you suffer no detriment.
- 1.7 Your malpractice/wrongdoing concern will be taken seriously and will be treated fairly and justly by WIEHAG. We will endeavour to take all reasonable steps to ensure that no person under our control engages in victimization in any form and such disclosures will be dealt with in a confidential and sensitive manner.
- 1.8 Disciplinary action will be taken against anyone deliberately raising false and malicious allegations.
- 1.9 This policy will be monitored periodically by the Company to judge its effectiveness. If changes are required, the Company will implement them.

## 2. Procedure

- 2.1 Raising a concern: If you have a malpractice/wrongdoing concern, you should inform your immediate manager/office manager/general manager of the concern. If the concern involves your immediate manager or other members of staff, or for any reason you would prefer them not to be told, you may raise the matter with the CEO.
- 2.2 Should you feel at any time you need to take advice before doing so, you may contact the independent charity, Public Concern at Work on 02074046609. They provide free, confidential legal advice on matters raised in this policy.
- 2.3 If you have disclosed your worry internally and you are concerned either by the response or lack of response, or if you feel unable to talk to anyone internally for whatever reason, you can contact the CEO.
- 2.4 Fact Find: As the person raising the malpractice/wrongdoing concern, you decide if you wish to be accompanied at any fact-finding meeting(s) by a fellow employee of your choice who may be a friend or colleague or a staff consultative committee representative. You may confer with your companion during the course of the meeting and he/she may address the meeting but may not answer questions on your behalf. Individual(s) under investigation may also be accompanied on the same basis.
- 2.5 Investigation: A full investigation will take place with the objective of establishing whether malpractice/wrongdoing has occurred. The format of the investigation may vary depending upon the circumstances

2.6 Findings: The manager/office manager/general manager will communicate the findings of the investigation to:

- a) you as the person raising the malpractice/wrongdoing concern;
- b) the individual(s) under investigation; and if appropriate
- c) those members of WIEHAG management or external authorities who need to consider whether action should be taken on the basis of the findings.

However, should the findings be unsubstantiated and all internal procedures exhausted and the complainant is still not satisfied with the outcome of the investigation, the Company recognizes the lawful rights of the employees and ex-employees to make disclosures to prescribed persons (such as the Health and Safety Executive) or, where justified elsewhere.

Altheim, July the 12<sup>th</sup>, 2021



**Dr. Erich Wiesner**

CEO WIEHAG Holding GmbH, WIEHAG GmbH and Director WIEHAG UK LTD