

WENOKES Limited

33 Harrison Drive,
High Halstow,
Rochester, Kent,
ME3 8TF



POLICY NAME	Bribery, Corruption & Fraud Policy		POLICY NO.	WP1	
EFFECTIVE DATE	3 rd March 2025	DATE OF LAST REVISION	13 th August 2025	VERSION NO.	2
ADMINISTRATOR RESPONSIBLE	Evan Stokes & Matt Wenham	CONTACT INFORMATION	contact@wenokes.com		

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR
1	M.Wenhan & E.Stokes	03/03/2025	New Document	M.Wenham & E.Stokes
2	M.Wenham & E.Stokes	13/08/2025	Update of all sections.	M.Wenham & E.Stokes

APPROVAL AND REVIEW

- Annual review by the Compliance Officer and Board.
- Additional reviews after changes in law or significant incidents.
- Regular risk assessments in project and procurement processes

PURPOSE

The purpose of this policy is to ensure WENOKES Limited conducts all operations with integrity, transparency, and in compliance with applicable anti-bribery, anti-corruption, and fraud laws.

This includes the UK Bribery Act 2010, Fraud Act 2006, Proceeds of Crime Act 2002, and relevant international legislation such as the OECD Anti-Bribery Convention.

SCOPE

This policy applies to:

- All employees, directors, and officers of WENOKES Limited.
- Contractors, consultants, agency staff, and subcontractors.
- Third parties, including suppliers, business partners, agents, and intermediaries acting on our behalf.
- All activities undertaken by WENOKES Limited, globally, regardless of local law being less stringent.

POLICY STATEMENT

WENOKES Limited operates a zero-tolerance approach to bribery, corruption, and fraud.

We will not:

- Offer, promise, give, request, or accept any undue advantage for personal or commercial gain.
- Make facilitation payments or kickbacks.
- Engage in fraudulent activity, including misrepresentation of facts, falsification of records, or misuse of company resources.

TERMS AND DEFINITIONS

TERM	DEFINITION
Bribery	Offering, giving, receiving, or soliciting an undue advantage to influence an action improperly.
Corruption	Abuse of entrusted power for private gain.
Fraud	Intentional deception or manipulation for personal or financial gain.
Facilitation Payments	Unofficial payments to expedite routine actions – prohibited under this policy.
Conflict of Interest	A situation where personal interests compromise, or appear to compromise, professional judgment.

POLICY SECTIONS

Our Commitments

1. Gifts & Hospitality

- Must be legal, proportionate, and reasonable.
- Any gift or hospitality **over £50** must be declared and approved by senior management.
- **Prohibited:** cash gifts, personal services, or anything that could improperly influence business decisions.
- All accepted/declined offers must be recorded in the **Gifts & Hospitality Register**.

2. Due Diligence

- Background and sanctions checks will be conducted for all key third parties.
- Contracts must include an **anti-bribery and fraud clause**.

3. Financial Integrity

- All transactions must be accurately recorded, traceable, and supported by documentation.
- No off-the-books accounts or false invoices are permitted.

4. Anti-Competitive Practices

- WENOKES Limited prohibits participation in any form of anti-competitive behaviour, including price-fixing, bid-rigging, market allocation, or collusion with competitors.
- All employees and contractors must comply with applicable competition and anti-trust laws in every jurisdiction where we operate.

5. Training & Awareness

- Mandatory **annual training** for all employees.
- New hires must complete anti-bribery training before starting work.

6. Speak Up Culture

- Concerns can be raised confidentially via our **Speak Up Policy**.
- Anonymous reporting is permitted.
- Retaliation against whistleblowers is treated as gross misconduct.

Reporting

Concerns should be reported via:

- Directly to your line manager, Compliance Officer, or HR.
- The confidential **Speak Up channel**: contact@wenokes.com.

Reports will be:

- Logged securely.
- Investigated promptly by **an independent investigator, internal or external, with no conflict of interest**.
- Concluded within a reasonable timeframe (normally within 30 working days), with findings documented and outcomes communicated as appropriate.

Breaches & Consequences

- **Employees:** May face disciplinary action, including dismissal.
- **Third Parties:** May face contract termination, blacklisting, or legal action.
- **Legal Obligations:** Serious breaches will be reported to relevant enforcement authorities.

ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITY
Board / Senior Management	Maintain an effective anti-bribery and fraud framework, allocate resources, and set ethical tone.
Compliance Officer	Oversee policy implementation, training, and investigations.
Managers / Supervisors	Ensure their teams understand and comply with the policy.
Finance Department	Enforce financial controls and audit requirements.
All Staff & Contractors	Act with honesty and integrity, and report suspected breaches immediately.

Signed: 

Matt Wenham
WENOKES Limited
Date: 13/08/2025

Signed: 

Evan Stokes
WENOKES Limited
Date: 13/08/2025