



Anti-Bribery and Corruption Policy

Our Commitment

At **Woodville Recycling Limited**, we are committed to ethical business practices and comply with all relevant anti-bribery and anti-corruption legislation, including the Bribery Act 2010. We ensure that no bribes, improper payments, or inducements are made, offered, or accepted by us or on our behalf.

What is bribery?

Bribery involves giving, offering, or receiving any form of financial or other advantage to influence an individual's actions improperly. This applies to both public and private sector dealings, including engaging with foreign officials.

Consequences of bribery

Breaches of the Bribery Act can result in significant fines, legal costs, imprisonment, and reputational damage. For employees, non-compliance may lead to disciplinary action, including dismissal.

Responsibilities

This policy applies to all employees, contractors, agents, and business partners working on behalf of **Woodville Recycling Limited**. All parties are responsible for preventing, detecting, and reporting bribery. Reports should follow the procedures outlined in our **Whistleblowing Policy**.

Facilitation payments

Facilitation payments (small payments made to expedite official procedures) are strictly prohibited. Any such payments made in life-threatening situations must be reported immediately.

Gifts and hospitality

Gifts and hospitality should never be used to influence business decisions. Care must be taken to ensure that any gifts or hospitality are proportionate and do not create conflicts of interest. All gifts and hospitality must be recorded in the Gifts and Hospitality Register.



Charitable and political donations

- Charitable donations: Only donations to registered charities are permitted and must be properly documented.
 - Political donations: **Woodville Recycling Limited** does not make political donations. Employees may make personal donations but must not represent them as being on behalf of the company.
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Due diligence and risk assessment

When dealing with third parties, we will assess the risks of bribery, including territorial risks, cross-border payments, and unusual payment methods. Due diligence will be conducted to ensure compliance with this policy.

Reporting and whistleblowing

Any concerns related to bribery should be reported through our **Whistleblowing Policy**. All reports will be treated confidentially, and no employee will face repercussions for raising genuine concerns.