



Anti-Bribery and Corruption Policy

JK Wildlife Management Ltd

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1.0 Policy Statement

JK Wildlife Management Ltd is committed to conducting all business activities with the highest standards of honesty, integrity, fairness and professionalism. We believe that ethical business practices are fundamental to maintaining the confidence of our clients, employees, suppliers, subcontractors, regulators and the communities in which we operate. Bribery, corruption and any form of unethical conduct have no place within our organisation and are wholly incompatible with our values and reputation.

The Company operates a zero-tolerance approach to bribery and corruption in all forms. We will not directly or indirectly offer, promise, give, request or accept any financial or other advantage intended to improperly influence a business decision, secure preferential treatment, obtain an unfair commercial advantage or compromise the impartiality of any individual or organisation. This commitment applies equally to all business activities, irrespective of contract value, commercial opportunity or geographic location. JK Wildlife Management Ltd is committed to complying with the Bribery Act 2010 and all other applicable legislation relating to bribery, corruption, fraud and financial crime. We recognise that effective prevention extends beyond legal compliance and requires strong leadership, robust governance, proportionate risk management and a culture in which ethical decision-making is embedded throughout every level of the business.

This Policy applies to all directors, employees, agency workers, temporary staff, consultants, subcontractors, suppliers and any other individual or organisation acting for or on behalf of JK Wildlife Management Ltd. We expect all persons representing the Company to conduct themselves with integrity at all times, to avoid situations that could create actual or perceived conflicts of interest, and to ensure that all business decisions are made fairly, objectively and in the best interests of the Company and its clients.

The Company is committed to maintaining effective systems of financial control, transparent business records and appropriate governance

arrangements to prevent bribery and corruption. We will undertake reasonable and proportionate due diligence when entering into business relationships, maintain accurate accounting records, and ensure that all expenditure, gifts, hospitality and charitable contributions are properly authorised and recorded.

We encourage an open and transparent reporting culture in which employees and business partners can raise concerns regarding suspected bribery, corruption or unethical behaviour without fear of retaliation. All allegations will be treated seriously, investigated promptly and confidentially, and appropriate corrective or disciplinary action will be taken where necessary. Where criminal activity is suspected, the Company will cooperate fully with the relevant enforcement authorities.

The Managing Director has overall responsibility for ensuring that this Policy is implemented effectively and that adequate procedures are maintained to identify, prevent and manage bribery and corruption risks. However, preventing bribery is the responsibility of every individual associated with JK Wildlife Management Ltd. Compliance with this Policy is a condition of employment and engagement, and any breach may result in disciplinary action, termination of contractual arrangements and, where appropriate, criminal prosecution.

Through continual monitoring, periodic review and the ongoing development of our management systems, JK Wildlife Management Ltd is committed to maintaining the highest standards of ethical business conduct and ensuring that integrity, accountability and transparency remain at the centre of every business decision we make.

2.0 Legal and Regulatory Compliance

JK Wildlife Management Ltd is committed to conducting its business in full compliance with all applicable legislation, regulations and recognised standards relating to bribery, corruption, fraud and ethical business conduct. We recognise that compliance with the law forms the minimum standard

expected of the Company and are committed to maintaining systems, procedures and controls that promote transparency, accountability and integrity throughout our operations.

The Company continually monitors legislative developments and industry best practice to ensure our policies, procedures and business activities remain compliant with current legal requirements. All employees, directors, subcontractors and individuals acting on behalf of the Company are expected to understand and comply with the requirements of this Policy and all applicable legislation

2.1 Key Legislation

2.1.1 *Bribery Act 2010*

The Bribery Act 2010 provides the principal legislative framework for preventing bribery and corruption within the United Kingdom. JK Wildlife Management Ltd fully supports the objectives of the Act and has implemented appropriate procedures designed to prevent bribery in all aspects of its business activities.

The Company prohibits the offering, promising, giving, requesting or accepting of bribes and maintains appropriate controls to reduce the risk of bribery occurring within its operations. All business relationships are expected to be conducted fairly, transparently and without improper influence.

2.1.2 *Fraud Act 2006*

JK Wildlife Management Ltd is committed to preventing all forms of fraud, including false representation, abuse of position and the deliberate concealment of information for personal or commercial gain.

The Company maintains appropriate financial controls, approval processes and management oversight to ensure that business transactions are conducted honestly and accurately. Any suspected fraudulent activity will be investigated promptly and, where appropriate, referred to the relevant authorities.

2.1.3 Criminal Finances Act 2017

JK Wildlife Management Ltd recognises its responsibility to prevent the facilitation of tax evasion and other financial crime.

Reasonable procedures are maintained to ensure that all financial transactions are legitimate, properly authorised and accurately recorded. Employees and representatives must not knowingly participate in, assist or facilitate any activity which may constitute a criminal financial offence.

2.1.4 Proceeds of Crime Act 2002

JK Wildlife Management Ltd will not knowingly engage in, facilitate or benefit from money laundering or handling of criminal property.

JK Wildlife Management Ltd undertakes reasonable due diligence when establishing commercial relationships and maintains transparent accounting practices to minimise the risk of financial crime within its business operations

2.1.5 Companies Act 2006

JK Wildlife Management Ltd is committed to maintaining accurate corporate records, transparent governance arrangements and sound financial management in accordance with the Companies Act 2006.

Directors are expected to discharge their duties responsibly, act in the best interests of the company and ensure that decisions are made ethically, lawfully and with appropriate regards for stakeholders.

2.1.6 Procurement Act 2023

As a supplier to public and private sector organisations, JK Wildlife Management Ltd is committed to supporting fair, transparent and ethical procurement practices.

The Company will participate in procurement and tendering activities honestly and professionally, ensuring that information submitted during tender processes is accurate, complete and free from any misleading or deceptive statements. We will not seek to obtain contracts through bribery, corruption, collusion or any other improper practice

2.1.7 UK Ministry of Justice Guidance – Bribery Act 2010

JK Wildlife Management Ltd recognises the Ministry of Justice Guidance

issued under Section 9 of the Bribery Act 2010 concerning the implementation of adequate procedures to prevent bribery.

Our Anti-Bribery and Corruption Management System has been developed with regard to the six guiding principles contained within the guidance, including proportionate procedures, top-level commitment, risk assessment, due diligence, communication and training, and ongoing monitoring and review. These principles underpin the Company's commitment to maintaining effective and proportionate anti-bribery controls.

3.0 Policy Objectives

The objectives of this Anti-Bribery and Corruption Policy are to establish a clear framework for ethical business conduct, ensure compliance with all applicable legislation, and protect JK Wildlife Management Ltd from the legal, financial and reputational risks associated with bribery and corruption.

Through the implementation of this Policy, the Company seeks to promote a culture of honesty, transparency and accountability across all areas of its operations, ensuring that every individual acting on behalf of JK Wildlife Management Ltd understands their responsibilities and conducts business with integrity.

Our core objectives are to:

- Prevent all forms of bribery, corruption, fraud and unethical business conduct.
- Maintain full compliance with the Bribery Act 2010 and all other applicable legislation relating to bribery, corruption and financial crime.
- Promote a culture of integrity, honesty and accountability throughout the organisation.
- Ensure all business decisions are made objectively, fairly and without improper influence or personal gain.

- Protect the Company's employees, clients, suppliers, subcontractors and other stakeholders from the risks associated with bribery and corruption.
- Safeguard the Company's reputation by maintaining the highest standards of professional and ethical conduct.
- Implement proportionate systems of governance, financial control and risk management to identify, prevent and mitigate bribery risks.
- Ensure that gifts, hospitality, donations and sponsorships are managed transparently and do not create actual or perceived conflicts of interest.
- Encourage the prompt reporting of suspected bribery, corruption or unethical behaviour and ensure that all concerns are investigated fairly, confidentially and without fear of retaliation.
- Provide appropriate information, training and guidance to ensure that employees and persons acting on behalf of the Company understand their legal and ethical responsibilities.
- Continually monitor, review and improve the Company's Anti-Bribery and Corruption Management System to ensure it remains effective, proportionate and aligned with current legislation, industry best practice and client expectations.

4.0 Responsibilities and Governance

Preventing bribery and corruption is the responsibility of every individual associated with JK Wildlife Management Ltd. The Company is committed to maintaining an effective governance framework that promotes ethical leadership, accountability and transparency at all levels of the organisation. Whilst the Managing Director retains overall responsibility for the implementation and effectiveness of this Policy, every employee, subcontractor and individual acting on behalf of the Company has a duty to

uphold the standards set out within this document and to report any suspected breaches without delay.

4.1 Managing Director

Has overall responsibility for ensuring that JK Wildlife Management Ltd conducts its business in accordance with this Policy and all applicable legislation relating to bribery and corruption.

Responsibilities include:

- Providing visible leadership and promoting a culture of honesty, integrity and ethical business conduct.
- Ensuring adequate procedures are established to prevent bribery and corruption throughout the organisation.
- Approving and periodically reviewing this Policy to ensure it remains suitable, effective and compliant with current legislation.
- Ensuring sufficient resources are available to implement, maintain and continually improve the Company's Anti-Bribery and Corruption Management System.
- Reviewing reports of suspected bribery or corruption and determining appropriate corrective or disciplinary action.
- Supporting investigations and cooperating with regulatory or law enforcement authorities where required.

4.2 Managers and Supervisors

Managers and supervisors are responsible for promoting compliance with this Policy within their areas of responsibility and leading by example through ethical decision-making and professional conduct.

Responsibilities include:

- Ensuring employees understand and comply with the requirements of this Policy.
- Identifying and managing bribery and corruption risks associated with operational activities.

- Escalating concerns or suspected breaches to senior management without delay.
- Ensuring business decisions are made fairly, objectively and without improper influence.
- Supporting investigations and implementing corrective actions where required.

4.3 Subcontractors, Consultants and Suppliers

JK Wildlife Management Ltd expects all subcontractors, consultants, suppliers and other business partners to uphold standards of conduct consistent with this Policy.

Individuals and organisations acting on behalf of the Company are expected to:

- Conduct business honestly, fairly and professionally.
- Comply with all applicable anti-bribery legislation.
- Refrain from offering or accepting any improper payment, inducement or advantage in connection with Company business.
- Promptly notify JK Wildlife Management Ltd of any suspected bribery, corruption or unethical conduct that may affect the Company or its clients.
- Cooperate with any reasonable due diligence or investigation undertaken by the Company.

Failure to comply with these standards may result in the suspension or termination of contractual arrangements and, where appropriate, referral to the relevant authorities.

4.4 All Persons Acting on Behalf of the Company

Every individual representing JK Wildlife Management Ltd has a duty to protect the Company's reputation by conducting business with honesty, integrity and impartiality.

No person shall knowingly participate in, authorise or ignore any act of bribery or corruption. Where an individual is uncertain whether a proposed

action may breach this Policy, they must seek guidance from the Managing Director before proceeding.

The Company expects ethical conduct to form an integral part of every business decision and will support individuals who raise genuine concerns regarding suspected wrongdoing in good faith.

5.0 Training and Competence

JK Wildlife Management Ltd recognises that effective prevention of bribery and corruption depends upon ensuring that all individuals understand their legal obligations, ethical responsibilities and the standards of behaviour expected whilst representing the Company. We are committed to providing appropriate information, instruction and training to promote a culture of integrity and to ensure that all personnel are equipped to identify, prevent and report bribery and corruption risks.

Training requirements will be proportionate to an individual's role, responsibilities and level of exposure to commercial, financial or procurement-related activities. The Company will ensure that employees understand both the legal requirements of applicable anti-bribery legislation and the practical procedures established within this Policy.

Core Training Includes:

- Understanding bribery, corruption and unethical business practices.
- Responsibilities under the Bribery Act 2010 and other relevant legislation.
- Identifying actual, potential and perceived conflicts of interest.
- Company procedures relating to gifts, hospitality, donations and sponsorship.
- Reporting procedures for suspected bribery, corruption or unethical conduct.
- Ethical procurement and supplier engagement.

- Record keeping, financial transparency and approval procedures.
- Personal responsibilities when representing JK Wildlife Management Ltd.

All new employees will receive appropriate information regarding this Policy as part of their induction. Where roles present a greater exposure to bribery risks, additional guidance or refresher training may be provided to ensure continued compliance with Company procedures and legislative requirements. The Managing Director is responsible for ensuring that suitable training arrangements are maintained and that this Policy is communicated to all employees and, where appropriate, to subcontractors, consultants and other persons acting on behalf of the Company.

Training records and evidence of policy communication will be maintained by the Company and reviewed periodically to ensure that awareness remains current and that individuals continue to understand their responsibilities under this Policy.

The Company will also ensure that any significant legislative changes, revisions to this Policy or emerging bribery risks are communicated promptly to relevant personnel, reinforcing our commitment to continual improvement and the maintenance of the highest standards of ethical business conduct.

6.0 Gifts, Hospitality and Business Courtesies

JK Wildlife Management Ltd recognises that the exchange of modest gifts and business hospitality can form part of maintaining positive professional relationships. However, such courtesies must never influence, or appear to influence, business decisions or compromise the integrity of any individual or organisation.

Employees and persons acting on behalf of the Company must not offer or accept gifts, hospitality or other benefits that could reasonably be perceived as an attempt to obtain preferential treatment or an improper

business advantage. Cash payments or cash equivalents, including gift vouchers, are strictly prohibited.

Any gift or hospitality offered or received must be reasonable, proportionate, lawful, infrequent and appropriate to the business relationship. Where there is any uncertainty regarding the suitability of a gift or hospitality, guidance must be sought from the Managing Director before acceptance or provision.

The Company reserves the right to require the declaration of gifts or hospitality where appropriate and may decline or return any item considered inconsistent with this Policy.

7.0 Conflicts of Interest

All individuals representing JK Wildlife Management Ltd are expected to act impartially and in the best interests of the Company at all times. Business decisions must be based upon objective commercial considerations and must never be influenced by personal relationships, financial interests or other improper considerations.

Employees must promptly declare any actual, potential or perceived conflict of interest that may affect, or appear to affect, their ability to carry out their duties fairly and objectively. This includes, but is not limited to, relationships with clients, suppliers, subcontractors or competitors, financial interests in other organisations, or any circumstance that could compromise professional judgement.

Where a conflict of interest is identified, the Company will assess the associated risks and implement appropriate measures to ensure the integrity of its decision-making processes.

8.0 Financial Controls and Record Keeping

JK Wildlife Management Ltd is committed to maintaining accurate, complete and transparent financial records that accurately reflect the nature of all business transactions.

All payments, receipts, expenses and contractual arrangements must be properly authorised, supported by appropriate documentation and recorded in accordance with the Company's financial procedures. False, misleading or incomplete records, undisclosed accounts and unauthorised payments are strictly prohibited.

Appropriate financial controls are maintained to minimise the risk of bribery, corruption and fraud, ensuring that expenditure is subject to appropriate oversight and that all transactions can be independently verified where required.

9.0 Reporting Concerns and Whistleblowing

The Company encourages an open and transparent culture in which employees and business partners are able to report suspected bribery, corruption, fraud or unethical conduct without fear of retaliation.

Any individual who becomes aware of, or suspects, behaviour that may constitute a breach of this Policy must report their concerns to the Managing Director as soon as reasonably practicable. All reports will be treated confidentially, investigated fairly and objectively, and handled in accordance with the Company's internal procedures.

No employee or representative will suffer detriment for raising a genuine concern in good faith, regardless of whether an investigation ultimately substantiates the allegation

10.0 Monitoring, Review and Continuous Improvement

JK Wildlife Management Ltd is committed to ensuring that this Anti-Bribery and Corruption Policy remains effective, proportionate and aligned with

current legislation, recognised industry best practice and the Company's operational activities.

The effectiveness of this Policy and the Company's associated procedures will be monitored through ongoing management oversight, periodic internal reviews and consideration of any reported incidents, identified risks, client feedback or legislative changes. Where opportunities for improvement are identified, appropriate corrective actions will be implemented to strengthen the Company's controls and governance arrangements.

This Policy will be formally reviewed at least annually by the Managing Director, or sooner where significant organisational changes, changes in legislation or emerging bribery and corruption risks make an earlier review necessary.

The Managing Director is responsible for approving this Policy, ensuring that adequate resources are available for its implementation and promoting a culture of integrity, transparency and ethical business conduct throughout JK Wildlife Management Ltd.



James Kennedy

Managing Director

