



**WADE**

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# **Anti-Bribery Policy**

John Wade Groundworks Ltd  
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Approved By: John Wade, Managing Director

Note: Reissued under new version control system. Previous version dates not recorded.

## Anti-Bribery Policy

Wade Group values its reputation for ethical behaviour and financial probity and reliability. Wade Group recognises that any involvement in bribery is illegal and will reflect adversely on its image and reputation.

Wade Group prohibits the offering, giving, soliciting or the acceptance of any bribe in whatever form to or from any person or company, public or private by any council member, member of staff, contractor, consultant, agent, overseas agent and any non-employee service provider engaged on company business for whatever reason.

The prevention, detection and reporting of bribery is the responsibility of all staff.

### **Dealing with contractors, agents and business partners**

The Bribery Act 2012 highlights a specific type of bribery that could lead to prosecution of the Wade Group:

- the liability to prosecution if a person associated with it bribes another person....., where an associated person is one who performs services on or behalf of the organisation; and....

This means that the Wade Group needs to take care to ensure that any contractors, agents or business partners acting on its behalf comply with the Act. It is therefore essential that contractors and agents acting on behalf of the Wade Group are made aware of the Wade Groups anti-bribery policy, through Wade Groups terms and conditions or through the tendering process for larger contracts.

### **Giving gifts and hospitality**

Staff may not, directly or through others, offer or give any, money, gift, hospitality or other thing of value to an official, employee or representative of any supplier, customer or any other organisation, if doing so could reasonably give the appearance of influencing the organisation's relationship with the Wade Group.

Staff may:

- give gifts of a nominal value
- with management approval, provide meals and other entertainment at venues outside the Wade Group, provided that the expenses are kept at a reasonable level. For the avoidance of doubt, the per capita cost of a meal should not exceed £50 and would normally be much less;

### **Receiving gifts and hospitality**

An employee or any member of their family should not, directly or through others, solicit or accept money, gifts, hospitality or anything else that could influence or



reasonably give the appearance of influencing the relationship with that organisation or individual.

Gifts or hospitality may not be accepted, irrespective of value, which might influence or be seen to influence such situations as the outcome of a tender , the award of business (contract), use of the Wade Group property or other assets, or to benefit personally or for the benefit of any person connected to that person.

Unless you have been informed otherwise you may accept:

- a gift of nominal value, such as an advertising novelty, when it is customarily offered to others having a similar relationship with that individual or organisation;
- customary meals or entertainment provided that the expenses are kept at a reasonable level.

For the avoidance of doubt:

- gifts with a value of more than £25 and hospitality expected to cost in excess of £50 should be authorised by management ;
- gifts or hospitality in excess of £100 should be authorised by John Wade;

If an excessive gift or hospitality is found to have been accepted, then your manager will discuss the circumstances with you and agree how to deal with it e.g. a gift can be returned or steps can be taken to ensure that the acceptance of hospitality does not influence a decision or situation in favour of the giver. If excessive gift(s) or hospitality are accepted on more than one occasion or are found to have influenced decisions inappropriately, against Wade Group (or potentially illegally), then appropriate disciplinary procedures will followed.

Signed:

John J Wade  
MEng (Hons)/ SMSTS  
Director  
Dated 01.10.2025

## Revision History

<b>Version</b>	<b>Date</b>	<b>Description of Change</b>	<b>Author</b>	<b>Approved By</b>
1.0	01.10.2025	Reissued under new version control system. Previous revision dates unknown.	J. Wade	J. Wade