



**WADE**

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# **Anti-Bribery Policy**

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

## Anti-Bribery Policy

Wade Group values its reputation for ethical behaviour, integrity, financial probity and reliability. We are committed to conducting all business activities honestly, fairly and in compliance with all applicable laws and regulations.

Wade Group prohibits the offering, giving, soliciting or acceptance of any bribe, facilitation payment, kickback or other improper inducement, whether directly or indirectly, from or to any individual, organisation, public body or private company.

The prevention, detection and reporting of bribery, corruption, fraud, malpractice and anti-competitive behaviour is the responsibility of all employees, directors, subcontractors, consultants, suppliers and any other parties acting on behalf of Wade Group.

This policy supports compliance with the Bribery Act 2010, Competition Act 1998, Enterprise Act 2002 and all other relevant legislation.

### **Dealing with Contractors, Agents and Business Partners**

The Bribery Act 2010 places responsibility on organisations to prevent bribery by persons associated with them.

Wade Group therefore takes reasonable steps to ensure that contractors, agents, consultants, suppliers and business partners acting on its behalf understand and comply with this policy.

This is achieved through:

- Supplier and subcontractor assessment procedures.
- Tendering and procurement controls.
- Contractual requirements.
- Ongoing monitoring of supplier relationships.
- Review of any concerns or allegations raised.

Any contractor or supplier found to be engaging in bribery, corruption, fraud or anti-competitive behaviour may have their contract terminated and may be reported to the relevant authorities.



### **Giving Gifts and Hospitality**

Employees may not directly or indirectly offer money, gifts, hospitality or anything else of value where it could reasonably be perceived as influencing a business decision or obtaining an unfair advantage.

Employees may:

- Give gifts of nominal value.
- Provide reasonable hospitality where it is legitimate, proportionate and approved by management.
- Attend normal business events and industry functions where attendance is appropriate.

The per capita cost of hospitality should not normally exceed £50.

### **Receiving Gifts and Hospitality**

Employees, directors and members of their families must not solicit or accept gifts, hospitality or benefits that could influence, or appear to influence, business decisions.

Gifts or hospitality must never be accepted where they could influence:

- Tender evaluations.
- Contract awards.
- Procurement decisions.
- Supplier selection.
- Any commercial or operational decision.

The following limits apply:

- Gifts over £25 require management approval.
- Hospitality expected to exceed £50 requires management approval.
- Gifts or hospitality exceeding £100 require approval from the Managing Director.

Any inappropriate gift should be politely declined or returned wherever practical.

### **Fraud Prevention and Malpractice**

Wade Group operates a zero-tolerance approach to fraud and malpractice.

Examples include:

- False invoicing.
- Falsification of timesheets or records.
- Misuse of company funds.
- Theft of company assets.
- Deliberate concealment of information.
- Misrepresentation during tendering or procurement activities.

To minimise risk, Wade Group maintains:

- Segregation of financial responsibilities where practical.
- Management approval processes.
- Invoice and payment verification procedures.



- Internal review of financial records.
- Procurement and purchasing controls.
- Independent review of tender submissions where appropriate.

Any suspected fraud or malpractice will be investigated and may result in disciplinary action, contract termination and referral to the relevant authorities.

### **Compliance with the Bribery Act 2010**

Wade Group reviews its business practices and procedures periodically to ensure compliance with the Bribery Act 2010.

This review includes:

- Assessment of procurement procedures.
- Review of gifts and hospitality arrangements.
- Review of subcontractor and supplier management processes.
- Monitoring of reported concerns and incidents.
- Evaluation of emerging risks and lessons learned.

Where improvements are identified, procedures will be updated and communicated to relevant personnel.

### **Competition Law and Anti-Competitive Behaviour**

Wade Group is committed to fair competition and compliance with all applicable Competition Laws.

Employees, directors, subcontractors and representatives must not engage in:

- Price fixing.
- Bid rigging.
- Cover pricing.
- Market sharing.
- Collusive tendering.
- Exchange of commercially sensitive information with competitors.
- Agreements intended to distort competition.

All estimates, quotations and tender submissions must be prepared independently and without consultation with competitors.

### **Detecting and Avoiding Anti-Competitive Behaviour**

To prevent and detect anti-competitive behaviour, Wade Group:

- Maintains independent estimating and pricing procedures.
- Restricts access to commercially sensitive information.
- Reviews procurement and tendering activities.
- Monitors relationships with competitors and industry contacts.
- Provides awareness of Competition Law requirements.
- Investigates concerns raised by employees, clients, suppliers or third parties.

- Requires managers and directors to challenge any conduct that may compromise fair competition.

Any concerns regarding anti-competitive behaviour must be reported immediately.

### **Reporting Concerns**

Anyone who becomes aware of suspected bribery, corruption, fraud, malpractice or anti-competitive behaviour must report the matter immediately.

Reports should be made to:

**John Wade – Managing Director**

Email: [team@wadegroup.org](mailto:team@wadegroup.org)

Telephone: 01254 820330

Reports may be made confidentially.

No employee will suffer detriment for raising a genuine concern in good faith.

### **Investigation Procedure**

Upon receipt of a report, Wade Group will:

- Record the concern.
- Undertake an initial assessment.
- Conduct a proportionate investigation.
- Review evidence and interview relevant parties where necessary.
- Determine appropriate corrective actions.
- Implement improvements where required.
- Refer criminal matters to the appropriate authorities where necessary.

All investigations will be handled confidentially and fairly.

### **Responsibilities**

The Managing Director has overall responsibility for:

- Implementing this policy.
- Monitoring compliance with the Bribery Act 2010.
- Monitoring compliance with Competition Law.
- Investigating reports of bribery, corruption, fraud or anti-competitive behaviour.
- Ensuring appropriate corrective actions are implemented.
- Reviewing this policy annually.

All employees, subcontractors, consultants and suppliers acting on behalf of Wade Group are responsible for complying with this policy and reporting any suspected breaches.



### **Monitoring and Review**

This policy shall be reviewed annually, or sooner if there are significant legislative, organisational or operational changes.

Compliance with this policy will be monitored through management review, procurement oversight, supplier assessments, tender reviews and investigation of reported concerns.

Failure to comply with this policy may result in disciplinary action, contract termination and/or referral to the relevant authorities.

Signed:

A handwritten signature in black ink, appearing to read 'John J Wade', is written over a faint, light-colored circular stamp.

John J Wade  
MEng (Hons)/ SMSTS  
Director  
Dated 09.06.2026



## 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
1.1	09.06.2026	Expanded to include fraud prevention, competition law compliance, anti-competitive behaviour controls, reporting and investigation procedures	F. Livesley	J. Wade