The Cinema Studio
Palace Building
Main Street
Grange-over-Sands
Cumbria LA11 6AB
United Kingdom

Tel: +44 (0)1229 824034
Web site: www.wilcock.co.uk

Services to the Onshore Natural Gas Industry

Company Policy in Relation to Potential Bribery or Corruption

The company will not tolerate bribery or allow improper offers or payments to or from it's employees or consultants working on behalf of the company or consultants placed by the company with clients, where these relate to the duties/ responsibilities associated with that placement. The company considers it's reputation for ethical behaviour, it's ability to protect client confidentiality and it's ability to demonstrate the implementation of an effective Anti-Corruption Programme to be crucial in relation to meeting it's clients' requirements. The Company complies with the 2010 Bribery Act and the overall responsibility for ensuring the implementation of this policy and of the Anti-Corruption Programme is vested in the Managing Director assisted by the company's managers.

The Anti Corruption Programme details the following:

1 The management and maintenance of a Bribery and Corruption risk assessment, which sets into appropriate context the anti corruption controls detailed in the programme.

2 Responsibilities for the oversight of the programme and for it's implementation.

3 Employment procedures for employees and appointment procedures for consultants and sub-contractors and relevant suppliers, managed through the company's accredited QMS.

4 Management of training and awareness in relation to potential for bribery and corruption and the company's procedures to detect and prevent it, managed through the company's accredited QMS and supported by Company Guidance on Ethical Behaviour and Compliance with the Anti Bribery and Corruption Policy.

5 Requirements for due diligence where risk assessment indicates that it is appropriate, managed through the company's accredited QMS.

6 Financial controls managed through the company's financial management system and external auditors

7 Arrangements for reporting and investigating potential instances of bribery or corruption and review of performance in relation to the programme, managed through the company's accredited QMS.

The company will ensure that all employees and consultants are made aware of this policy by:

1 Explaining this policy to all new employees as part of the company's formal induction procedures and documenting this in accordance with the company's accredited quality management system.

2 Including reference to this policy in employment contracts for employees and contracts for services for all consultants.

3 Issuing a copy of this policy to all staff and placed consultants and publishing the policy on the company website.

4 Any supplier or sub-contractor whose duties and responsibilities cover activities where this policy would be relevant shall be identified by the manager authorised to appoint them and shall be issued with a copy of this policy and required to comply with it.

To support employees and consultants in their compliance with this policy, the company maintains Company Guidance on Ethical Behaviour and Compliance with the Anti Bribery and Corruption Policy which is issued to all permanent staff and to appropriate consultants and project staff.

Performance in relation to this policy and implementation of the Anti Corruption Programme shall be reviewed in accordance with the company's accredited QMS. The policy will be reviewed by the Managing Director in response to the findings of any investigation into any potential instance of bribery or corruption or of any significant failure to implement or comply with the Anti Corruption Programme and in relation to any relevant new legislation or published guidelines. It will also be reviewed at least annually as part of the Management Review carried out as part of the company's accredited QMS. The new policy will be displayed and re-issued as detailed above.



Graham Wilcock, Managing Director
21st May 2026

Rev. 12 Reviewed following Management Review Meeting 14/05/2026