

## Anti Bribery & Corruption Policy

Calla Woods is committed to the highest ethical standards and requires all employees to be aware of and comply with its policies and guidelines on corporate conduct. Bribery is never acceptable. We operate a strict no tolerance policy towards bribery in all its forms, whether directly or through third parties. We expect our clients and business partners to operate in the same way.

Employees should act with integrity at all times and should not engage in bribery and corruption activity of any kind.

Calla Woods regards actual or attempted bribery and corruption very seriously, and its policy is:

- To take all appropriate measures to deter bribery and corruption;
- To maintain necessary procedures to prevent and detect bribery and corruption;
- To investigate vigorously all instances of suspected bribery and corruption;
- To deal with suspected bribery and corruption as it sees fit, including reporting it to the appropriate authorities, with the intention of pursuing criminal prosecution and/or civil litigation;
- To assist the police and other law enforcement bodies in the investigation and prosecution of suspected offenders;
- To recover from offenders any assets wrongfully obtained;
- To protect employee confidentiality in line with Calla Woods Whistle Blowing policy; and
- To communicate Calla Woods Anti Bribery & Corruption Policy to all employees via induction programmes, handbooks, etc. Employees are expected to:
  - Strictly comply with this and other associated ABC policies;
  - Undertake ABC training promptly and complete declarations timorously;
  - To report immediately any suspicion of bribery and corruption in line with Turner & Townsend's Whistle Blowing policy;
  - Take responsibility for bribery and corruption prevention and detection; and
  - Make our business partners aware of this policy.



**Michael Barry**  
**Managing Director**

**08 January 2020**