

Bribery and corruption is, unfortunately, a feature of public and corporate life and SWGR and therefore we have a clear policy on anti-bribery and corruption to support our employees to make decisions in line with our values.

Our ethical conduct is based on our commitment to acting professionally, fairly and with integrity. SWGR does not tolerate any form of bribery and corruption.

This sets out SWGR's policy on our ethical responsibility and is supported by a procedure, which details further how we achieve this and is maintained within the management system, which can be viewed or requested.

The purpose of this policy is to set out the responsibilities of SWGR employees in observing and upholding our values with respect to bribery and corruption

This policy applies to all SWGR employees (permanent, temporary, volunteers and contractors). The policy also extends to all our country representatives in which we operate. Where we have a minority interest, we will encourage the application of this policy among our partners.

In all aspects of our responsibilities we work closely with our external stakeholders, clients, suppliers and sub-contractors to ensure ethical working is achieved at all times.

In particular our Procedures details how we will deal with:-

- Bribery as underpinned by the UK bribery Act of 1st July 2011
- Conflicts of Interest
- Gifts and Hospitality
- Payments Under Duress
- Child Labour
- Modern Slavery Act 2015
- General Data Protection Regulations (GDPR)

**Signed:**



**Raj Sinha**  
**Group Managing Director**