



# World Transport Overseas Group (WTO) Anti-Corruption and Anti-Bribery Policy

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**Introduction:** World Transport Overseas Group (WTO) is steadfast in its commitment to upholding the highest standards of business conduct and ethics. Our policy is rooted in the principles of honesty, ethics, and legal responsibility, aligning with international laws and anti-bribery and anti-corruption standards.

**Scope:** This policy applies to all Directors, managers, employees, and third-party agents representing any World Transport Overseas entity, whether within our offices or on behalf of our clients. Compliance with applicable governmental regulations prohibiting bribery and corruption, such as the UK Bribery Act, the Foreign Corrupt Practices Act (FCPA), and the Organization for Economic Cooperation and Development (OECD) Convention, is mandatory.

**Cultural Commitment:** We are dedicated to fostering a culture and environment that ensures the actions of all stakeholders, including employees, directors, and contractors, are in strict adherence to regulations prohibiting bribery and corruption. The CEO and corporate management lead this commitment, driving the objectives of this policy throughout the organization.

**Objectives and Implementation:** To achieve these goals, WTO commits to:

*Promoting a Culture of Compliance:*

Encouraging all employees, directors, owners, contractors, and third-party agents to share a commitment to ethical conduct.

*Regulatory Compliance:*

Adhering to all relevant regulatory requirements, including anti-bribery and anti-corruption obligations in contractual agreements.

*Regular Policy Review:* Conducting an annual review of this policy to ensure continued relevance and appropriateness.



***Training and Competence:*** Recognizing that the effectiveness of any system relies on the commitment and competence of its users, all WTO employees will receive instruction in the use of and requirements of our compliance and ethics management system, ensuring employees are well-equipped to carry out their roles competently.

***Employee Involvement:*** Employees are encouraged to actively participate in and contribute to improving service and product quality. With their commitment and involvement in all business operations, we will achieve our ethics and compliance goals and work towards the attainment and maintenance of our corporate mission.

***Consequences of Non-Compliance:*** Failure to comply with this policy may result in criminal or civil penalties for employees and third-party agents representing the Company. Additionally, WTO reserves the right to take disciplinary action, up to and including termination.

***Conclusion:*** World Transport Overseas Group is resolute in its commitment to the highest standards of anti-bribery and anti-corruption. Through the implementation and administration of this policy, we aim to instill a culture of integrity, accountability, and ethical conduct across all levels of the organization.

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