

WATG Anti-Corruption Policy

1. *For the purposes of this Policy, "corruption" includes bribery, extortion, fraud, deception, collusion, cartels, abuse of power, embezzlement, trading in influence, money-laundering and similar criminal activity.*
2. *Corruption causes poverty and suffering, inhibits economic growth, is damaging to business, and may result in criminal and civil liability and penalties for organisations and individuals.*
3. *WATG prohibits its officers and employees, and those of its branch offices and those related companies which it controls, from engaging in any form of corruption in relation to WATG 's business and affairs.*
4. *WATG will use all reasonable endeavours to conduct its business and affairs so as to ensure that it does not engage in or facilitate any form of corruption.*
5. *In order to minimise the opportunity for corruption, WATG does not make any political or charitable donation, or provide any gift or hospitality to any person or organisation which are in excess of reasonable limits under the circumstances. It also prohibits the receipt by WATG or any of its officers or employees of any donation, gift or hospitality which is in excess of reasonable limits. All donations, gifts and hospitality provided or received by WATG or its officers or employees must be recorded in a gifts register which is routinely inspected.*
6. *A facilitation payment is a payment made to encourage a person to carry out his duty. While facilitation payments are allowed in certain limited circumstances, often they are a form of corruption and the making or receiving of an improper facilitation payment is a criminal offence in many jurisdictions. WATG prohibits the making of any improper facilitation payment, save in circumstances where the personal safety of any person is endangered.*
7. *Anti-corruption action by individual organisations is not sufficient to reduce corruption in the design & construction sector to any significant extent. There must, in addition, be concerted and collaborative action by all stakeholders. WATG supports international efforts and works with other stakeholders to reduce corruption in the design & construction sector.*
8. *WATG has adopted a corporate anti-corruption programme to enable it to comply with this Policy. WATG will properly implement this programme and review it on an annual basis to ensure that it is operating effectively.*
9. *Anyone with concerns about a specific action governed by this Policy or information about a violation of this Policy is encouraged to contact a Managing Director or the CEO of WATG.*

Signed this 2nd day of June 2014



Michael Seyle, President + CEO