



OVERVIEW

WJ is committed to the highest standards of ethical conduct and integrity in its business activities. The purpose of this policy is to establish a culture of openness, trust and to emphasize the employee's, suppliers and clients expectation to be treated to fair business practices. This policy will serve to guide business behaviour to ensure ethical conduct. Effective ethics is a team effort involving the participation and support of every employee. All employees should familiarize themselves with the ethics guidelines that follow this introduction.

All WJ employees, subcontractors and suppliers must comply with the policy and it extends to all of our business dealings and transactions in all countries which WJ or our subsidiaries and associates operate. The policy extends to WJ having proportionate procedures to ensure that all service providers (including subcontractors and suppliers) comply with WJ's anti-bribery, ethics and corruption policies.

BUSINESS INTEGRITY & ETHICS

Board of Directors Commitment to Ethics

- The Board of Directors and Senior Management staff must set a prime example to all WJ employees, subcontractors, suppliers and clients alike.
- In any business practice, honesty and integrity must be top priority for Directors and Senior Management.
- Directors and Senior Management staff must have an open door policy and welcome suggestions and concerns from employees. This will allow employees to feel comfortable discussing any issues and will alert Directors and Senior Management to concerns within the work force.
- Directors and Senior Management staff must disclose any conflict of interests with regards to their position within WJ Groundwater.

Employee Commitment to Ethics

- Employees will treat everyone fairly, have mutual respect, promote a team environment and avoid the intent and appearance of unethical or compromising practices.
- Every employee needs to apply effort and intelligence in maintaining integrity and high standards of ethical conduct.
- Employees must disclose any conflict of interests with regards to their position within WJ Groundwater.
- Employees will help to increase client satisfaction by providing quality products, services and a timely response to inquiries.
- Employees should consider the following questions before embarking on any course of action or behaviour of questionable ethical practice:
 - Is this legal?
 - Does this comply with all of WJ's appropriate policies?
 - Does this reflect WJ's values and culture?
 - How would our clients react?
 - Would you feel personally concerned if this appeared in a news headline?
 - Could this adversely affect WJ if all employees did it?



- How would you feel explaining this to a judge?

Company Awareness

- Promotion of ethical conduct within interpersonal communications of employees will be rewarded.
- WJ will promote a transparent and open atmosphere to reinforce the vision of ethics within the company.

Maintaining Ethical Practices

- WJ will reinforce the importance of transparency and integrity. Every Director, Manager and Employee will maintain high ethical standards and will support ethical behaviour.
- Employees at WJ will encourage open dialogue, get honest feedback and treat everyone fairly, with honesty and objectivity.

Unethical Behaviour

- WJ will avoid the intent and appearance of unethical or compromising practice in relationships, actions and communications.
- WJ will not tolerate harassment or discrimination.
- Unauthorized use of company trade secrets & marketing, operational, personnel, financial, source code, & technical information integral to the success of our company will not be tolerated.
- WJ will not permit impropriety at any time and we will act ethically and responsibly in accordance with laws.
- WJ employees will not use corporate assets or business relationships for personal use or gain.

ETHICAL PROCUREMENT

WJ will maintain our ethical standards and behave respectfully when working with others. The relationships with our suppliers and business partners are based on the principle of fair and honest dealings at all times and in all ways. Suppliers must conduct their businesses in an ethical manner and must not seek to gain competitive advantage by means of unethical or dishonest practices including without limitation; bribery, corruption, kickbacks, the provision of gifts, favours or services. We expect our suppliers and business associates to extend the same high standards to all others with whom they do business, including employees, sub-contractors and other third parties.

WJ have developed a Supply Chain Agreement and Sustainable Procurement Policy which all suppliers must sign up to. This agreement and policy must be followed.

HUMAN RIGHTS

WJ will ensure that it will comply with both the wording and spirit of the Human Rights Act 1998 and the Modern Slavery Act 2015

We support the belief that human rights are universal and adhere to the principles of human rights in our operations. We support the United Nations Universal Declaration on Human Rights and work hard to ensure that in all areas of interaction with our employees, clients, suppliers, third parties and interviewees, individuals are protected and treated absolutely fairly.

WJ provide a clear commitment to the protection of young workers and both the prevention of child labour and forced, bonded or involuntary labour throughout our business and supply chain to include the following:



- WJ is committed to not recruiting or hiring workers below the age of 15 or in compliance with the local minimum age (whichever is higher). WJ's suppliers must accept the principles of remedial action and support for child and under age workers, and where such labour is discovered suppliers must establish and implement appropriate support measures for such workers and introduce effective systems to prevent the use of child labour in the future.
- WJ is committed to complying with all applicable legal and customer requirements.
- WJ is committed to not allowing young workers (below the age of 18) to work overtime, at night, or in hazardous jobs.
- WJ's Suppliers must not use any form of forced, bonded or involuntary labour.

BRIBERY & CORRUPTION

The Bribery Act 2010 ('the Act') came into force on 1 July 2011 and created a framework of four criminal offences:

- giving, promising, and offering of a bribe;
- agreeing to receive or accept a bribe;
- bribing a foreign official; and
- failure of commercial organisations to prevent bribery.

Any breach of the Policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of WJ.

WJ does not tolerate, permit, or engage in bribery, corruption, or improper payments of any kind in our business dealings, both with public officials and people in the private sector. Ethical behaviour is in the long term interests of our Company.

WJ is committed to the following key Anti-Bribery and Corruption principles:

- We will carry out business fairly, honestly and openly. We will not give or offer any money, gift, hospitality or other advantage to any person carrying out a business or public role, or to a third party associated with that person, to get them to do something improper.
- We will not give or offer any money, gift, hospitality or other advantages to any public official (UK or foreign) with the intention of influencing them to our business advantage.
- We will not use intermediaries or subcontractors for the purpose of committing acts of bribery.
- We do not allow employees to accept money, gifts, hospitality and other advantages from business associates, actual or potential suppliers, or service providers which are intended to influence a business decision or transaction in some improper way.
- Any employee found to be in breach of these principles will face disciplinary action.
- No employee will suffer demotion, penalty, or other adverse consequence for refusing to pay bribes, even if it may result in WJ losing business.
- We will avoid doing business with others who do not commit to conducting business without bribery.
- We are committed to a programme to counter the risk of WJ being involved in bribery. We will have adequate procedures in place to ensure that all employees understand the implications of the Act and our procedures. We will have appropriate mechanisms in place to record any problems.

Our policy applies to every part of our business and to every part of the world in which we operate.



Anti-Bribery, Ethics and Corruption Policy

We expect all staff to act honestly and with integrity to safeguard WJ's and our customers' assets, including information, goodwill, property and equipment. We each have a responsibility for fraud prevention, detection and reporting and the Board encourages anyone with a reasonable suspicions of fraud or corruption to report them.

All staff must be vigilant concerning gifts, hospitality and the actions of third parties engaging in transactions on our behalf. These three areas can frequently involve giving or accepting a bribe in ways which are not immediately identifiable.

GIFTS & HOSPITALITY

This policy is not intended to prohibit the giving or receipt of reasonable and proportionate hospitality designed to cement business relationships or enhance knowledge of people, products or services. When considering offering or accepting gifts, hospitality or entertainment you must ensure that:

- These are offered in good faith and are occasional, appropriate, reasonable, and proportionate.
- These are a normal business courtesy (such as paying for a meal or shared taxi).
- These comply with the law, including those applicable to UK and foreign public officials.
- They could not be perceived in anyway as a bribe.
- They are not in cash.

Reasonable entertainment in restaurants, theatres and sporting or cultural events is allowed provided that it is not excessive and is not repeated on frequent occasions.

POLICY COMPLIANCE

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment and reporting of any criminal activity to the relevant authorities.

Anyone who suspects unethical behaviour or is offered a bribe or asked for a bribe, or is aware of any form of fraudulent or corrupt activity should report it immediately to their Line Manager, the Human Resources Manager or a Director.

All cases of unethical behaviour, attempted, suspected or proven fraud or corruption will be investigated and dealt with appropriately.

No employee will suffer as a result of reporting reasonable suspicions.

Richard Fielden
Managing Director

Toby Roberts
Executive Chairman

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