



ANTI-BRIBERY AND ANTI-CORRUPTION

Whybirds is a signatory to The FIDI Anti-Bribery and Anti-Corruption Charter. Accordingly we have adopted a zero-tolerance approach to bribery and corruption.

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action. It is illegal, and it is a breach of trust.

A bribe is an inducement or reward offered, promised or provided in order to gain a commercial, contractual, regulatory or personal advantage

Corruption, bribery or attempted bribery is unacceptable. This applies whether offering a bribe, or accepting a bribe. It is against Whybirds core values of conducting business to the highest legal, moral and ethical standards.

Whybirds are committed to legal and ethical behaviour, and will refrain from doing anything that will harm the interests of Whybirds, other FIDI affiliates, clients, or the industry.

Whybirds, at all times, will act professionally, fairly and with the utmost integrity in all business dealings and relationships.

Whybirds undertakes to:

1. Never engage in any form of bribery, either directly or through any third party.
2. Work against corruption including bribery and extortion in all forms.
3. Never offer or make an improper payment, or authorise an improper payment (cash or otherwise) to any individual, including any local or foreign official anywhere in the world.
4. Never attempt to induce an individual, or a local or foreign official to act illegally or improperly.
5. Never offer, or accept, money or anything of value, such as gifts, kickbacks or commissions, in connection with the procurement of business or the award of a contract.
6. Never offer or give any gift or token of hospitality to any public employee or government official or representative if there is any expectation or implication for a return favour.
7. Never accept any gift from any business partner if there is any suggestion that a return favour will be expected or implied.
8. Never facilitate payments to obtain a level of service which one would not normally be entitled to.
9. Never disregard or fail to report any indication of improper payments to the appropriate authorities.
10. Never induce or assist another individual to break any applicable law or regulation.