



# Anti-Bribery and Corruption Policy

NRC WWS Ltd is committed to conducting business at the highest level of honesty and integrity. All team members and third-party agents are required to comply with this policy, applicable anti-bribery and anti-corruption laws, and any procedures developed to implement and enforce this policy.

Team members and third-party agents must not offer, request, or receive anything of value (such as money, goods, or services) even if the same are common within the area where business is conducted, in order to obtain or retain business, direct business to any person, receive an improper advantage, or influence any act or decision.

Team members may, in certain circumstances, pay or be the beneficiary of certain promotional and marketing expenses (e.g., meals, entertainment, travel and lodging) if such expenses are modest, reasonable, and necessary in light of routine business purposes.

Promotional gifts of nominal value bearing NRC's logo or the gift giver's Company's logo may be given or received by team members as a courtesy or token of regard, but any other gifts are prohibited from being given unless approved in writing in advance by the Managing Director.

A gift received that does not qualify as a promotional gift as described above with a fair market value in excess of £100 is prohibited and must be rejected.

Contributions of NRC funds or other assets for political or charitable purposes must be approved in writing in advance.

Team members and third-party agents must maintain accurate and complete books and records that will provide sufficient detail to reasonably reflect all transactions.

Failure to abide by applicable anti-bribery and anti-corruption laws may result in criminal, civil and regulatory penalties for the Company, team members, and third-party agents.

If a team member or third-party agent encounters what may be a violation of this policy, the team member or third-party agent must report such activity.

For additional information on what is expected of each team member and third-party agent as it relates to this policy, please refer to the Company's Handbook.

Any willing or intentional violation, or failure to report an intentional violation, of this anti-corruption policy will result in disciplinary action, up to and including termination.

**Gary McDermott**  
Managing Director

01/02/2023

**Date**

Status: Issued	Approved by: Managing Director	Page 1 of 1
----------------	--------------------------------	-------------