

Business Ethics Policy

WSUP is committed to conducting business with integrity, openness, transparency and accountability; and to showing respect for human dignity and the rights of individuals and communities. We have a “zero tolerance” approach to fraud and prohibit bribery in any form whether direct or indirect. We will ensure that the policy is applied in all WSUP’s activities and in dealings with development partners, agents, contractors and other third parties with whom we have business relationships. Our policy establishes the pillars for ethical conduct and performance, and covers the following areas:

- Transparency
- Human Rights
- Labour Standards and Modern Slavery
- Safeguarding
- Individual Conduct
- Conflicts of Interest
- Bribery and Corruption
- Fraud
- Environment, Health and Safety
- Corporate Governance
- Whistleblowing

We encourage any party to report actual, attempted or suspected fraud and/or other forms of illegal activity and/or other breach of any of the provisions within this policy, without fear of reprisal, to their Manager (if a member of staff), or use the Whistleblowing Procedure to raise a concern with the Chief Executive or Chair of the Finance & Audit Committee.

We will thoroughly investigate any allegations of breach of any of the provisions within this policy. We will address any instances of breach in accordance with the Disciplinary Policy or relevant contractual clauses with associated third parties. We have the right to dismiss or transfer to other duties any personnel who breach any of the provisions within this policy or to immediately terminate a contract with a third party.

All managers and supervisors will receive adequate training on the policy. They additionally have a duty to familiarise themselves with the types of improprieties and/or breaches that might occur within their areas of responsibility and to be alert for any indications of irregularity. All staff are responsible for ensuring that WSUP’s reputation and assets are protected against impropriety, reporting any known or suspected breach and assisting in the investigation of suspected breach.

The policy will be reviewed and revised as necessary at regular intervals (at least every five years) in consultation with the Risk Committee of the Board. Responsibility for adherence to this policy is delegated by the WSUP Board to the CEO of WSUP.

This policy was approved by the WSUP Board of Directors on 29th July 2021.