

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

Introduction

Westlife Foodworld Limited (WFL) is committed to the setting up, utmost standards for transparency and accountability in all its affairs. WFL does not tolerate any form of bribery, misappropriations or corruption, and will uphold all laws countering bribery, fraud and corruption in all forms.

Purpose

The purpose of this policy is to set out the responsibilities of WFL and those individuals acting on its behalf in observing and upholding WFL's position on bribery and corruption. Every individual or group of individuals, associated to WFL in any form, whether the staff members, the ad-hoc staff engaged in the program activities of the organization, the consultants, the contractors, the interns, the partner organizations and any other party with a financial or trustee-beneficiary relationship with WFL are expected to share this commitment.

Objective

To identify and prevent bribery, corruption and procedures to be followed, if at all, any fraud is found or having an idea / impression of it's existence.

Role and responsibilities

- All directors, employees and any person associated and engaged with WFL must ensure that they read, understand, and comply with this policy.
- The prevention, detection, reporting of acts, conduct constituting bribery and/or corruption and avoid any activity that might lead to or suggest a breach of this policy, shall be the responsibility of all directors, employees and any person associated and engaged by WFL.
- The directors, employees and any person associated and engaged by WFL are expected to immediately report actual or suspected or possible violations of this policy to the Vigil & Whistle-blower committee.
- Directors, or employees or any person engaged on fixed term contracts or contractual basis by WFL can also raise concerns to the Vigil and Whistle-blower committee if they believe or suspect that a breach of or conflict with this policy has occurred or may occur in the future.

Anti-bribery/ Anti-corruption

- WFL has zero tolerance approach to bribery and corruption whether directly or indirectly.
- The areas of business where corruption, including bribery, can most often occur include Gifts, Entertainment and Hospitality, Facilitation Payments, Procurement Process, Improper Performance of Duties, Favours Regarding Recruitment, Promotion or Posting Opportunities.
- The directors, employees and any person associated and engaged by WFL shall not, directly or indirectly through their family and other connections, solicit or accept any personal fee, commission or other form of remuneration arising out of transactions involving WFL. This includes gifts (either cash or kind) or other benefits of significant value.
- Giving, offering, promising employment, promotions, transfers, postings, trainings, and internship in order to obtain or retain an undue advantage is considered as bribery and/or corruption.
- WFL maintains a strict zero-tolerance towards both soft dollar commissions and kickbacks. Directors, employees, and any person associated and engaged with WFL must not accept or solicit any soft dollar commissions as part of their professional activities. Additionally, they should avoid any transactions or arrangements that could be perceived as kickbacks. Accepting or offering kickbacks is strictly prohibited, and any violations will be addressed promptly.
- In no case, charitable contributions, sponsorships, or donations can be used as a substitute for bribery. All charity, sponsorship or donation activities are to be done in good faith and should not be aimed to gain any business or other advantage quid pro quo that may be considered improper.
- Directors, employees and any person associated and engaged by WFL are prohibited from entering/ facilitating any such transaction or association of any kind, which is intended to, or which may be perceived as being intended to laundering of funds for any kind of illegitimate activities under the applicable laws.
- Concerns on the violations of the policies may be reported through the Whistle Blower mechanism.
- WFL takes all potential violations of this policy and applicable anti-corruption laws seriously. Thus, all allegations will be kept confidential and proper investigation will be conducted as directed in the Vigil and Whistle-blower policy.
- No personnel who in good faith, reports a violation, shall suffer harassment, retaliation or adverse employment consequences.

Breach of the policy

Compliance with the Anti-Bribery and Anti-Corruption Policy is a key requirement for all the directors and employees along with adherence to other applicable laws, rules, regulations and processes. Any violation of this Policy will be regarded as a serious matter and shall result in disciplinary action or contract terms or any action under law as deem fit.

Periodic review and evaluation

Westlife Leadership Council will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy and effectiveness. WFL reserves the right to vary and/or amend the terms of this Policy from time to time.