

WWRD United Kingdom, Ltd.

Lobbying and Governmental Engagement Policy

Background

Lobbying is the practice of individuals and organisations trying to influence the opinions and decisions of officials in positions of power, such as MPs, MEPs members of the House of Lords or other local or national Government officials. Provided that it is conducted in a manner that demonstrates accountability, transparency and compliance with all applicable legal requirements, it is a perfectly acceptable and normal part of the legislative process.

The aims of this policy are:

- to set out the responsibilities of every individual working in or with WWRD, at any level or grade, in observing and upholding WWRD's position on political involvement; and
- to protect both WWRD and individual employees from any appearance of impropriety and to protect the integrity of WWRD's decision-making process.

This policy must be read in conjunction with the Global Anti-Bribery and Corruption Policy. It is meant to supplement good judgment and all WWRD staff should respect its spirit as well as its wording.

Policy

WWRD will ensure that any lobbying undertaken by WWRD is carried out with honesty, integrity and in an appropriate manner.

WWRD operates on a politically neutral basis. WWRD seeks to inform governments and policy makers about WWRD's business and to influence public policy on issues related to WWRD's business. WWRD may work closely with governments and policy makers to inform policy on key issues specifically relevant to WWRD's business, including intellectual property, employment relations, product safety and country of origin issues.

- Any public affairs activity carried out by or on behalf of WWRD will be conducted through specific employees or consultants appointed by WWRD's CEO to engage in and co-ordinate planned public affairs activity on WWRD's behalf.
- WWRD does not make political contributions to any political party.
- Employees and Directors who are involved in political activity outside work must ensure that their involvement does not in any way represent the views of WWRD or bring the company into disrepute.
- WWRD employees or any consultants appointed to represent it must use every reasonable endeavour to satisfy themselves of the truth and accuracy of all statements made or supplied to institutions of government.

WWRD participates in trade bodies/associations or organisations for a variety of reasons, including networking, building industry skills, civic participation and monitoring of industry policies and trends. WWRD's participation in trade bodies/associations or organisations, including membership of a trade association/organisation board, does not mean that WWRD agrees with every position such trade association/organisation takes on every issue. In fact, from time to time, WWRD's corporate position may differ from that of the trade association/organisation of which we are a member.

WWRD makes payments to such trade bodies/associations or organisations, including membership fees and dues.

- Employees who attend trade bodies/associations or organisations on behalf of WWRD may become involved in lobbying activity. This activity is permissible provided that the individual has declared his/her involvement to the CEO and the trade body/association or organisation has been approved to represent WWRD's views.
- Employees attending trade bodies/associations or organisations must ensure they are aware of WWRD's corporate position on matters discussed and remain true to this.
- Any trade body/association or organisation representing WWRD must do so in accordance with this Policy.