

ANTI BRIBERY AND CORRUPTION POLICY

WoDS Transmission plc (“the Company”) is a special purpose company set up to operate an offshore transmission system following the issuance of a transmission licence by the Gas and Electricity Markets Authority (the ‘Authority’) under section 6(1)(b) of the Electricity Act 1989.

The Company’s principle regarding the treatment of Bribery and Corruption is to refuse to offer, give or receive bribes or improper payments, or participate in any kind of corrupt activity, either directly or through any third party. It is the Policy of the Company, in terms of Bribery & Corruption, to:

Never:

- Participate in any form of corrupt behaviour.
- Engage public officials to provide services without approval from the Company’s board.
- Conceal or fail to record accurately and completely the true nature of our activities, or falsify or tamper with the Company’s books or records.
- Pay more than fair market value for goods and services, and

Always:

- Seek to avoid even the appearance of wrong doing. Recognise that an allegation of bribery or corruption can seriously damage the Company’s reputation.
- Record all payments and benefits provided to public officials and report any attempts to bribe or solicit bribes the Company and any suspicions we have about bribery and corruption.
- Consider whether there could be any conflicts of interest in the appointment of any supplier or contractor.
- Consider whether the pricing for work and services provided by sub-contractors, such as on variations, has been calculated and charged in accordance with the relevant contractual documentation.
- Consider whether any claims for payments submitted by sub-contractors are in accordance with the spirit and letter of the relevant contractual documentation (e.g. milestones completed, timing, amount, etc.).

In implementing this policy, the Company will:

- Publish this policy on the Company’s website.
- Ensure, where practicable, that contract and procurement documents detail requirements for compliance with the Bribery Act.
- Ensure any employees or persons acting on behalf of the Company receive training regarding our Anti-Bribery and Corruption policy and procedures and understand the implication of non-compliance.
- Through financial and governance procedures, regularly assess compliance with this policy.

The Company will review this policy on an annual basis to ensure its continued suitability.

This policy was approved by the Board of Directors on 26 May 2016.