

## **Organised Crime Policy**

WOSS:UK

## 1. Policy Statement

WOSS:UK is committed to preventing and addressing any involvement or association with organised crime. We have a zero-tolerance approach to organised crime in any form, and we are committed to maintaining the highest standards of integrity and professionalism in all our operations. This policy outlines our approach to identifying, preventing, and addressing organised crime risks within our company, operations, and supply chain.

## 2. Legal Framework

This policy is in compliance with:

- The **Serious Crime Act 2015**, which criminalises participation in or facilitation of organised crime.
- The **Proceeds of Crime Act 2002**, which requires businesses to report suspicious activity linked to criminality, including the laundering of illicit proceeds.

## 3. Our Commitment

We are committed to:

• Preventing any involvement in organised crime, including human trafficking, drug trafficking, money laundering, fraud, and other criminal activities.

- Ensuring that no employee, contractor, or business partner uses our company resources for criminal activities.
- Maintaining a vigilant approach to identifying risks associated with organised crime.
- Cooperating fully with law enforcement authorities in investigations related to organised crime.

## 4. Identifying Risks of Organised Crime

We recognise that there are several risks that could expose the company to organised crime, including:

- The use of our services, resources, or facilities by criminal organisations for illegal activities.
- Corruption or coercion of employees or contractors to engage in criminal activities.
- Vulnerabilities in our supply chain could be exploited by criminal groups.
- Money laundering, which could involve the concealment of illicit funds through legitimate business transactions.

## 5. Employee and Contractor Responsibilities

All employees and contractors are required to:

- Comply with this policy and report any suspicious activities related to organised crime.
- Avoid any engagement with individuals or groups suspected of being involved in organised crime.
- Immediately report any knowledge of organised crime activities to management or the designated point of contact.
- Cooperate with investigations related to organised crime when requested by law enforcement or management.

#### 6. Reporting Concerns

If an employee or contractor suspects or identifies any activities related to organised crime, they are required to report their concerns as soon as possible. Reports should be made to:

- The designated manager or supervisor.
- The company's confidential whistleblowing hotline or email (details provided in the company's Whistleblowing Policy).

All reports will be handled with the highest level of confidentiality, and the company will ensure there are no repercussions for individuals reporting concerns in good faith.

# 7. Monitoring and Auditing

We will:

- Continuously monitor our operations and financial transactions to identify any potential involvement in organised crime.
- Conduct regular audits of our supply chain, partners, and contractors to ensure no links to organised crime.
- Review any relevant suspicious activity and take immediate corrective action where necessary.

# 8. Cooperation with Authorities

We are committed to:

- Cooperating fully with law enforcement authorities in investigations or inquiries related to organised crime.
- Complying with any legal obligations to report suspected criminal activity or to assist in criminal investigations.

# 9. Disciplinary Action

Any employee or contractor found to be involved in organised crime or facilitating criminal activities in any way will face severe disciplinary action, including termination of employment or contract. We will also fully cooperate with law enforcement authorities in any resulting criminal investigations or prosecutions.

## **10. Review and Communication**

This policy will be reviewed regularly to ensure its continued relevance and effectiveness. All employees, contractors, and relevant stakeholders will be informed of any updates to the policy.