



Conflict of Interest Policy



1. PURPOSE

The purpose of the policy is to set out a framework to enable employees to identify, disclose, manage and monitor conflicts of interests with a view to preserving the integrity, transparency and impartiality of WFS's business.

2. SCOPE

This Policy applies to all employees of WFS and its affiliates worldwide (WFS).

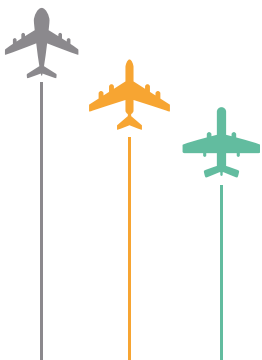
3. KEY CONCEPTS

3.1 When does a conflict arise?

- Generally, a conflict of interest in the workplace arises when an employee's personal interests conflict with the best interests of its employer making it impossible for the employee to fulfil its obligations to its employer without harming its own interests.
- A conflict of interest may be actual, perceived or potential:
 - > Actual – when there is a conflict between an employee's duties and responsibilities in the workplace and his or her personal interests;
 - > Perceived – when a reasonable person knowing the facts would consider that a conflict of interest may exist, whether or not this is indeed the case;
 - > Potential – where an employee has a personal interest that could conflict with their duties and responsibilities in the work place.
- A conflict may be financial but it does not have to be; it may equally arise from personal relationships, beliefs or involvement in social, cultural, religious or sporting activities.

3.2 Examples of conflicts

- The employee has a financial interest in a company that does business with or competes with WFS;
- The employee uses connections obtained through WFS for his or her own private purposes;
- The employee has a second job which means that he or she cannot devote the time required to perform his or her duties at WFS;
- The employee uses WFS resources to support an outside interest;
- The employee acts in a way that may compromise WFS eg by taking bribes.



4. RESPONSIBILITIES

- It is the responsibility of the employee to act at all times in the best interests of WFS;
- Employees are expected to diligently and continuously monitor whether their activities are likely to lead to a conflict or even give the appearance of a conflict, and to act accordingly.
- WFS employees are required to avoid situations which may create a conflict between their personal interests and those of WFS. They must also refrain from representing WFS and intervening or influencing decisions in which, directly or indirectly, they themselves have a personal interest.
- Employees are not permitted to use, for their own personal contracts or orders, third parties with which they have business dealings as part of their activities for WFS. This is particularly applicable if the employee is able, directly or indirectly, to influence whether that third party receives a contract from WFS.

5. DISCLOSURE

- It is important that any actual, perceived or potential conflict of interest is identified and reported in full to the Group General Counsel at the earliest opportunity;
- Upon receipt of the information, the Group General Counsel will consider either alone or jointly with the Ethics Committee whether a conflict exists and determine what action should be taken;
- No action which could be affected by the conflict should be taken unless and until approved by the Group General Counsel;
- Once a conflict of interest or potential conflict has been disclosed, WFS may take suitable measures to deal with any such conflict.

6. CONTACTS

If you have any questions concerning this Policy, please contact the Group General Counsel. Any violations of this Policy should be reported to the Group General Counsel.

