

Document ref:	Fraud and Anti-Bribery Policy	Rev:	001
Ezone Template Location:	03 Knowledge Area	Author:	SHE-Q
Ezone Storage Location:	16 SHEQ	Date issued:	09.2018

Fraud and Anti-Bribery Policy

The Board of the Erith Group is committed to carrying out business in an open, fair, honest and transparent manner which promotes a business culture and working environment of sound corporate governance that engenders personal and business integrity and has zero tolerance to fraud.

The Erith Group will endeavour to prevent the occurrence of fraud, including money laundering and is firmly committed to maintaining the necessary procedures to detect and investigate all instances of suspected fraud and money laundering. For the purpose of this policy statement, fraud is defined as the use of deception with the intention of obtaining an advantage; avoiding an obligation or causing loss to another party. Money Laundering is defined as the concealment of the origins of illegally obtained money, typically by means of transfers involving foreign banks or legitimate businesses. Without limitation, this policy refers to:

- Theft, the misappropriation or misuse of assets for personal benefit
- Bribery and corruption
- Blackmail or extortion
- Accepting or offering an inducement to or from a third party, which could be considered a kickback or gift
- False accounting and/or making fraudulent statements with a view to personal gain or gain for another, e.g. falsely claiming overtime, travel and subsistence, sick leave or special leave (with or without pay)
- Collusion between bidders on a tender competition to favour a particular bidder
- Externally perpetrated fraud against an organisation
- The concealment of the origins of illegally obtained money

The Erith Group acknowledges its responsibility under competition law not to engage in any anticompetitive arrangements (whether orally or in writing) where the intention or the effect is in some way to restrict, prevent or distort competition through collusive tendering in bid competitions.

This includes:

- 'Cover pricing' where one bidder suggests a price for another bidder to return
- Any other agreement amongst competitors to fix the prices including the prices paid to suppliers
- Any agreement between competitors that involves deciding which competitor will win a particular contract or dividing up the business so that only some tenderers will bid for work in a particular area or of a particular type

Prevention of Fraud and Money Laundering is achieved via:

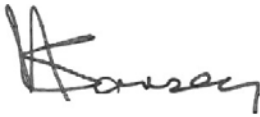
- The maintenance of and strict adherence to internal control procedures and levels of authority as laid out in the Erith Group IMS procedures
- The requirement of staff to act at all times honestly and with integrity to safeguard the resources for which they are responsible
- Fraud and Anti-Bribery Policy
- Regular review of internal control procedures by senior management
- External audits
- Use of the Erith Group based financial software to minimise the potential for manipulation through unauthorised amendments
- Regular detailed review of tenders and projects by senior management

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All employees have a shared responsibility for the deterrence and detection of fraud amongst fellow employees and workers of the Erith Group. Employees are required to raise any concerns they may have with their Line Manager. If this is inappropriate the report can be made to a Director or Board Director. Any such reports are treated in the strictest confidence and will be properly investigated. The individual making the report will be fully protected from any consequences or reprisals.

Following an allegation of fraud:

- Matters will be dealt with promptly
- Evidence will be collated, adequately supported and recorded
- Company disciplinary procedures will be implemented
- Where appropriate, the police or other appropriate authorities will be notified
- The Erith Group will assist in any investigation and prosecution of suspected fraud
- The rules of natural justice will be applied

A handwritten signature in black ink, appearing to read 'Steven Darsey'.

Steven Darsey
Company Chairman
12th September 2018