

Anti Fraud and Bribery Policy



POLICY STATEMENT

ANTI FRAUD AND BRIBERY

1. Objective

- 1.1 Speedier Scaffolding Ltd is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices. Speedier Scaffolding Ltd has zero tolerance toward such behavior. Losses due to fraud, bribery and all other corrupt business practices can be more than just financial in nature; they can potentially damage the company's reputation as well. The reputation of Speedier Scaffolding Ltd for lawful and responsible business behavior is of paramount importance and is one of its greatest assets.
- 1.2 This policy provides a coherent and consistent framework to enable Speedier Scaffolding Ltd employees to understand and implement arrangements enabling compliance. In conjunction with related policies and key documents it will also enable employees to identify and effectively manage any potential breach.
- 1.3 It is required that all personnel, including those permanently employed by Speedier Scaffolding Ltd, temporary agency staff and contractors:
 - act honestly and with integrity at all times and to safeguard the Company resources for which they are responsible
 - comply with the spirit, as well as the letter, of the laws and regulations of all areas in which Speedier Scaffolding Ltd operates or hopes to operate, in respect of the lawful and responsible conduct of business
 - respect Speedier Scaffolding Ltd's customers, suppliers and other parties with whom it must interact to achieve its objectives by conducting business in an ethical, lawful and professional manner.
- 1.4 The key legislation and/or sources of Global best practice that input into this policy are:
 - UK Fraud Act 2006
 - UK Anti-Terrorism, Crime & Security Act 2001
 - UK Combined Code on Corporate Governance
 - UK Money Laundering Regulations 2007
 - UN Convention Against Corruption
 - The Bribery Act 2010

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2. Scope

- 2.1 Within Speedier Scaffolding Ltd, the responsibility to control the risks of unethical business practices' occurring resides at all levels of the organisation. It does not rest solely within assurance functions, but in all business units and corporate centre functions.
- 2.2 This policy covers all personnel, including those permanently employed by Speedier Scaffolding, temporary agency staff and contractors.

3. Policy Framework

- 3.1 Speedier Scaffolding Ltd is required to have an effective compliance program that prohibits unethical conduct, which includes but is not limited to, the following components:
 - communication of a code of conduct to employees;
 - reporting and investigation of allegations of fraud, bribery and other corrupt practices;
 - appropriate disciplinary procedures for employees who are found to have engaged in such practices;
 - monitoring of the effectiveness of such controls.
- 3.2 Consequently, Speedier Scaffolding Ltd must take the appropriate steps to ensure that it and all its employees and those acting on its behalf:
 - meet all legal and regulatory requirements governing the lawful and ethical conduct of business;
 - ensure all breaches or suspected breaches of this policy are fully investigated and, if appropriate, invoke disciplinary measures and take prompt action to remedy the breach and prevent any repetition;
 - make all employees aware of their personal responsibilities and adhere strictly and at all times to this policy;
 - provide information to all employees and further guidance if they have any question or uncertainty regarding these requirements;
 - provide information to all employees on the procedures available to them to report any breach or suspected breach of this policy
 - prohibit employees or person and entitles acting on behalf of Speedier Scaffolding Ltd to receive, offer, promise, improperly influence payment, authorise payments or contract award, directly or indirectly, in return for anything of value (for example bribe or kickback)
 - prohibit payments including "facilitating" or "expediting" payments to others in order to secure prompt or proper performance of routine duties;
 - prohibit the use of subcontracts, purchase orders or consulting agreements either as a means of channeling payments, or otherwise rewarding such persons or their relatives or business associates;
 - ensure transactions are properly and accurately recorded.

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3.3 The relevant laws extend to activities undertaken by others acting on Speedier Scaffolding Ltd's behalf. Their actions can subject Speedier Scaffolding Ltd to liability and therefore care should be taken to ensure that contractors, agents and others who are acting on behalf of Speedier Scaffolding Ltd do not engage in any illegal or improper conduct.

3.4 Speedier Scaffolding Ltd will take firm disciplinary action in cases of proven fraud, bribery or other corrupt practices. This will very likely be immediate termination. Furthermore, all significant cases of such practices shall be reported to the public authorities unless the Company Secretary and Board of Directors approves otherwise.

4. Related Documents

4.1 Speedier Scaffolding Ltd documents related to this policy statement are:

- Employee Handbook
- Ethical and Social Policy

5. Key Contacts

Policy Owner

- Company Secretary & Board of Directors

Policy Lead

- Financial Director

First Point of Contact for reporting suspected breach

- Immediate Manager
- Company Secretary / Financial Director
- Managing Director

6. Monitoring and Compliance

6.1 The Company Secretary & Board of Directors will review compliance with this Policy statement annually, with the Policy Lead. Any changes needed to ensure its effectiveness will be drawn to the attention of the Board itself.

6.2 Speedier Scaffolding Ltd will ensure that it has the necessary arrangements in place to monitor and report compliance against defined fraud categories and against this policy on an annual basis.

6.3 Compliance will be monitored through the annual review process. General understanding and awareness to the policy will also be assessed within the employee survey.

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7. Definitions

Fraud: Intentional misrepresentation or concealment of the truth in order to secure something of value from another. The Fraud Act 2006 includes fraud by false representation, by failing to disclose information and by abuse of position.

Corruption: Illegal, immoral or dishonest behavior.

Bribe: to ask or make someone do something for you, in return for payment (for example, but not limited to) payment, gifts, money or favours

Employee: Any full or part-time director, officer, manager or employee of Speedier Scaffolding Ltd.

8. Timing

- Date original policies came in to effect March 2007
- Date procedure was last updated November 2016
- Date procedure will next be reviewed November 2021

Signed

Date: 25th February 2022

A handwritten signature in black ink, appearing to read 'J Bate', is written over a horizontal line.

John Bate
Managing Director