

1.0 OVERVIEW

It is Design4Structures (D4S)'s policy to uphold sound, responsible and fair business operations. The company is committed to promoting and maintaining the highest possible ethical standards in relation to all its business activities. Our reputation for maintaining lawful business practices is of paramount importance to us and this policy is designed to preserve these values. D4S therefore has a zero-tolerance policy towards bribery and corruption. The company is committed to acting fairly and with integrity in all its business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter bribery.

2.0 PURPOSE

The purpose of this policy statement is to set clear principles for countering fraud, corruption, and bribery. The policy statement applies to all employees, full time, part time, temporary or casual, who work for D4S.

The company expects that individuals and organisations that it deals with (suppliers, contractors, service providers etc.), will act with integrity and without thought or actions involving fraud and corruption. Breach of this policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement with the associated person

3.0 CULTURE AGAINST FRAUD AND CORRUPTION

The duty to prevent, detect and report any incident of bribery and any potential risks rests not only with the Directors of the company but applies equally to all employees and associated persons. The strategy should be directed against fraud and corruption whether it is attempted against D4S externally or from within.

D4S expects that employees at all levels will lead by example in ensuring adherence to legal requirements, contract procedure, financial procedure, codes of conduct and best (professional) practice. As part of this culture, the company will provide clear guidelines by which concerns can be raised by all employees.

Senior Management is expected to deal with those who defraud D4S or those who are corrupt. The company, including Senior Management and Directors, has a zero-tolerance approach and will deal with financial malpractice promptly and firmly.

4.0 RAISING CONCERNS

Although this document specifically refers to fraud and corruption, it equally applies to any form of malpractice that can reduce confidence in D4S and its services. This includes acts committed outside of official duties, but which impact upon the companies trust in the individual concerned. Examples may

include the criminal acts of theft of material goods, which includes all assets and cash, false accounting, obtaining by deception, pecuniary advantage by deception, computer abuse or computer crime. It also includes bribery and corruption. All employees can be exposed to a number of pressures, from outside influences, to act in a particular way in a particular case which may involve favouritism regarding the access to all kinds of services and benefits.

D4S encourages all employees and associated persons to be vigilant and to report any inappropriate or unlawful conduct, suspicions or concerns promptly and without undue delay so that investigation may proceed, and any action can be taken expeditiously. Employees should normally raise concerns with their immediate manager; however, it is recognised that they may feel inhibited in certain circumstances. In this case, employees should contact either the Managing Director or if appropriate utilise D4S whistle blowing policy.

Concerns will be treated in confidence, properly investigated and dealt with fairly. There is a need to ensure that any investigation process is not misused, therefore, any internal abuse, such as raising malicious or vexatious allegations, will be dealt with as a disciplinary matter.

5.0 RESPONSIBILITY


The Company's CEO has lead responsibility for ensuring compliance with this policy and will review its contents on a regular basis. They will be responsible for monitoring its effectiveness and will provide regular reports in this regard to the Directors of the Company who have overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations.

6.0 DEFINITIONS

- Corruption is the "offering, giving, soliciting or acceptance of an inducement or reward which may improperly influence the action of any person"
- Fraud is the "intentional distortion of financial statements or other records by persons, internal or external to the organisation, which is carried out to conceal the misappropriation of assets or otherwise for gain"
- Bribery Act 2010 – creates a new offence which can be committed by commercial organisations which fail to prevent persons associated with them from bribing another person on their behalf
- Fraud Act 2006 – the act repeals and replaces the eight deception offences in the Theft Acts 1968-1996 and introduces a general offence of fraud and other fraud offences which can be used in particular circumstances.

7.0 PROCEDURE/PROCESSES

Supporting procedures/processes are available in SharePoint; conducted within the Employee Handbook.

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