

FRAUD PREVENTION AND ANTI-BRIBERY AND CORRUPTION POLICY

Policy Statement

Fifteen Design Ltd is committed to operating a framework for the prevention and detection of fraud, bribery and corruption and a robust process to be followed in the event that a fraud, act of bribery or corruption is suspected.

Commitments

We shall be a Company that:

- will uphold all UK legislation relevant to countering fraud, bribery and corruption, including the Bribery Act 2010
- requires employees and persons working on our behalf to act at all times with honesty, integrity, propriety and due care in all matters, but particularly in the safeguarding of the Company, its associated assets and its reputation and that of its parent
- strictly prohibits and will not tolerate fraud, acts of bribery or any other form of corrupt behaviour
- understands and regularly assesses the nature and extent of risks relating to fraud, bribery and corruption
- ensures by appropriate due diligence that those it does business with share the culture of intolerance to fraud, bribery and corruption
- maintains and clearly communicates its expectations through the Code of Responsible Business Conduct, Company Policy and, for employees, the Terms & Conditions Manuals
- dedicates sufficient resources to implement and embed procedures and to provide anti-fraud, bribery and corruption training
- ensures that practical, cost effective controls and procedures are implemented to proactively identify fraud, bribery and corruption or the threat of fraud, bribery and corruption
- formulates and requires adherence to control processes designed to prevent and detect fraud, acts of bribery and corruption
- remains alert to the risk of fraud, bribery and other irregularities both within the organisation and in organisations with which the company contracts and reports any matters of potential concern
- recognises that signs of fraud, bribery and corruption in the organisation and/or its supply chain could be an indication of other illegal or unethical activity, such as modern slavery and/or human trafficking
- promotes an open, honest and questioning culture which encourages propriety and vigilance amongst all personnel
- maintains an effective Fraud, Bribery and Corruption Response Plan and ensures any matters of suspected or actual fraud, bribery or corruption are dealt with under this Plan, overseen or led by Internal Audit
- implements a process to enable all personnel to raise any matter of genuine concern, including to an independent organisation who will treat the call with discretion and confidentiality (Reporting of Concerns (Whistleblowing) Policy)
- takes seriously any breach of this Policy, which may ultimately lead to dismissal via the Company disciplinary procedure, or for non-employees may result in permanent removal from the Fifteen Design Ltd sites, and/or be subject to the involvement of the Police and judicial system in the event of any criminal activity
- reserves the right to recover losses associated with breach of this Policy
- periodically monitors and audits this Policy and its associated procedures