



ANTI FRAUD & BRIBERY POLICY

Introduction:

The purpose of this policy is to set out Newmarket Plant Hire Limited's position on anti-fraud and bribery. Newmarket Plant Hire Limited is committed to ensuring that its business is conducted in accordance with ethical, professional and legal standards in a fair, honest and open manner. We will endeavour to ensure that this is reflected in every aspect of the business and that we all act with high ethical standards.

Fraud and Bribery expose the Company, its employees and business partners to the risk of criminal prosecution in addition to harming the Company's reputation. Therefore, Newmarket Plant Hire Limited operates a zero tolerance of all forms of bribery or fraud. Senior Management will react swiftly and firmly if presented with evidence of fraudulent activity or financial malpractice.

Refer to the Bribery Act 2010, <https://www.gov.uk/government/publications/bribery-act-2010-guidance>

Definitions:

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 is "the offer, promise, giving, demanding or acceptance of an advantage in monetary or other form, as an inducement or reward for the improper performance of a function or activity which is expected to be performed in good faith, or impartially or by someone in a position of trust".

Examples of bribery include: -

- The direct or indirect promise, offering or authorisation of anything of value;
- The offer or receipt of monies;
- The giving of aid, donation or voting designed to exert improper influence;
- Payments for lavish or inappropriate entertainment or travel;
- Favours including offers of employment;
- Inflated commissions;
- Fake consultancy fees.

Corruption is "the misuse of power for gain".

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Statement of Intent:

This policy statement applies to all employees who work for Newmarket Plant Hire Limited. It is expected that all staff and other stakeholders will act with integrity and honesty. If they have any concerns, then they should be raised with their immediate line manager who will treat any such concern(s) in confidence.

Senior Management will conduct an investigation in a fair and reasonable manner and resultant actions may include disciplinary proceedings or even dismissal if the allegations made against a member of staff are upheld.

Although this policy specifically refers to fraud and bribery, it applies also to any forms of malpractice that reduce confidence in Newmarket Plant Hire Limited and its services. Examples may include theft of property, false accounting, obtaining by deception.

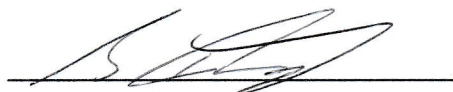
At times of special occasions such as Christmas, small gifts of nominal value may be accepted by prior agreement with your manager

Operational controls that have been embedded into the company include

- Clearly defined operating guidelines;
- Assignment of tasks to specific role/individuals;
- Clear communication of responsibilities;
- Registered Key holders
- Procedures and guidance issued with regard to screening of new employees.
- Regular review of actual results
- A library of policy, procedures, guidance and training on expected behaviour, including induction training.

This policy will be communicated to all employees and organisations working on our behalf and displayed at our offices and on our website www.nphgroup.co.uk . This policy is available to defined interested parties.

This policy will be reviewed annually or sooner by senior management to ensure its suitability. Where necessary it will be amended, reissued and communicated to all employees and people working on its behalf.



Ashley Tarrant, Managing Director

Date: 11th August 2023