

Incentive FM Group Ltd

Anti-Fraud, Anti-Corruption and Bribery Policy

Incentive FM Group Ltd is committed to the prevention, exposure and exploration of all forms of fraud, corruption and bribery, whether attempted from within or outside the Company.

Fraud is defined as dishonest, irregular or illegal acts, characterized by a deliberate intent at concealment or false representation, resulting in the diversion of resources, whether or not for personal gain, for the benefit of an individual or group of individuals.

Corruption is the giving or obtaining advantage through means which are illegitimate, immoral, and/or conflicting with one's duty or the rights of others.

Bribery is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage.

It is unacceptable to:

- give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
- give, promise to give, or offer a payment, gift or hospitality to any person to facilitate or expedite an established routine procedure
- accept a payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them
- retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy
- engage in activity in breach of this policy

Incentive FM Group Ltd is committed to creating an environment that is based on the prevention of fraud, corruption and bribery. This is achieved by promoting a philosophy of sincerity and honesty in all Company activities.

The Directors and employees play an important part in generating and preserving this culture. They are encouraged to voice any significant concerns about any aspect of the Company's work.

Incentive FM Group Ltd has adopted a Reporting System that allows issues to be raised in the guarantee that they will be properly investigated in a confidential manner. The System seeks to assure individuals that they will be protected from possible retaliation and that they have made disclosures in good faith. Incentive FM Group Ltd is committed to honouring this policy and to formally investigate any contraventions.

In addition to expecting the very highest standards from its employees, there is a belief and obligation that all individuals and organisations associated with the Company, such as contractors, partners and suppliers, will act with integrity. The Company's expectation on propriety and responsibility is that management and staff at all levels will lead by example. This is emphasized through our learning and development programme.

Management

Each of Incentive FM Group Ltd's Directors is responsible for the successful execution of controls designed to prevent and/or detect fraud within their specific areas.

Management at all levels is responsible for ensuring that their staff are aware of the Company's financial regulations and procurement rules and that the requirements are being met. They should also ensure that their

staff are aware of their responsibilities in relation to protecting the resources for which they are responsible and for reporting any suspected irregularities.

Directors and Managers should also strive to create an approachable environment in which their staff feel able to contact them with any concerns they may have about suspected irregularities.

Special arrangements may apply where employees are responsible for receiving income or are in charge of systems that generate payments. Managers should ensure that adequate and proper training is provided for staff and that checks are carried out from time to time to ensure that proper measures are being followed.

Directors/Management remain responsible for ensuring that information relating to personal conflicts of interest are reviewed regularly and where necessary, up-dated.

Employees

All staff are expected to follow all of the Company's codes and procedures, which are covered in the Employee Handbook.

Incentive FM Group Ltd recognises that a key precautionary measure in the fight against fraud, corruption and bribery is to take effective steps at the recruitment stage to ascertain, as far as possible, the previous record of potential staff in terms of their propriety and honesty.

Where appropriate, written references are obtained prior to appointing staff, including those employed on a temporary basis. This is also a requirement of the Company's Fidelity Guarantee insurance.

Additionally, where appointment is reliant on the holding of specific qualifications, the Human Resources Department manages the process for ensuring that stated qualifications are verified and copies of certificates retained on the individual's personal file.

The Company's Disciplinary Procedures, Improving Performance and Attendance Procedures are designed to help and encourage the achievement and continuance of agreed standards of conduct, attendance and performance. The procedures apply to all staff and aspire to ensure consistent and fair treatment of all individuals across the Company.

The role that individual staff are expected to play features in induction programmes and adequate on-going training must be provided by the Director/Manager responsible.

The attention of management should be alerted when staff do not regularly take annual holidays, or where through illness/vacancy levels, or recognised checking mechanisms breakdown. Additionally, complaints from customers or others could provide an indication of potential problems.

Internal Audit

The internal audit function is required to provide in particular assurance that:-

- internal controls are sound, adequate and appropriately applied
- assets and interests are safeguarded against losses arising from inefficient management, poor value for money, waste, theft, fraud, or any other cause
- Financial and other management data is suitable and reliable
- Rules, regulations, legislation, policy and procedures are being followed
- Risk management action is appropriately applied.

Incentive FM Group Ltd is committed to investigating all cases of suspected fraud and/or corruption and/or bribery. Any member of staff, regardless of their position or seniority, against whom prima facie evidence of fraud, corruption or bribery is found, will be subject to disciplinary procedures that may result in dismissal.

Concerns about any irregularity, be it financial or otherwise, can be raised in a number of ways. These include:-

- Raising the concern with an immediate manager or supervisor;
- Notifying the appropriate Director;

If a concern is raised through either of the above, the Manager, Supervisor or Director concerned has a responsibility to pass on the information obtained to the Director of Finance.

Or

- Reporting under the Company's Reporting System.

Should an accusation be made through the Incentive FM Group Ltd Reporting System, the Company's Monitoring Officer will first make enquiries to decide whether or not an investigation is justified by the facts provided and, if so, what form it should take. The Monitoring Officer's decision to proceed or not will be determined by whether or not it would be in the public interest to do so. The decision taken and the reasons will be formally recorded.

As appropriate, the matter raised may be:

- investigated by internal audit;
- investigated by management under a relevant human resources policy;
- referred to the Police; or
- referred to the external auditor

If the decision is taken to refer the matter to the Police, the Incentive FM Managing Director and the relevant Director will normally be informed.

The Company may still use its Disciplinary Procedures where the outcome of the investigation indicates improper behaviour despite whether the case has been passed to the Police. Internal action must not be delayed awaiting the results of any Police investigations, as the criteria of criminal and employment law differ.

As appropriate, the investigating officer will advise Directors/Managers on the correct future course of action. Recommendations relating to working procedures must be executed immediately to prevent the reoccurrence of malpractice.

Training

The Company recognises that the continued success of its Anti-Fraud, Corruption and Bribery Policy and its reliability will depend largely on the effectiveness of its employees throughout the organisation.

To encourage awareness, Incentive FM Group Ltd supports the belief of full induction, basic training and follow-up training. This applies particularly to those involved in internal control systems and financial and finance related systems, to ensure that their responsibilities and duties in this respect are regularly highlighted and reinforced.

It is a Manager's responsibility to ensure that all staff are adequately trained to carry out their duties. Any employee who ignores such training and guidance may face the possibility of disciplinary action.

Reparation

In all cases where the Company has suffered a financial loss, it will seek to recover it in full along with any costs incurred.

Employees

Incentive FM Group Ltd will seek the strongest available sanctions against staff who commit fraud. This will include disciplinary action, prosecution and civil proceedings. Employees found guilty of gross misconduct at disciplinary hearings will be subject to instant dismissal. Gross misconduct in this context covers offences of fraud, theft, serious financial malpractice and using their position for personal gain or for the gain of others.

As with all disciplinary matters, the level of proof required is that of the balance of probability. Disciplinary cases involving allegations of fraud, corruption, bribery and financial misconduct will be handled on this basis.

Contractors

The terms of Incentive FM Group Ltd contracts require that contractors take all reasonable actions, in accordance with good industry practice, to prevent any fraudulent activity by their employees, the Contractor (including its shareholders, members, directors) and/or any of the Contractor's suppliers, in connection with the receipt of monies from the Company.

The Contractor must advise Incentive FM Group Ltd immediately if it has reason to suspect that any fraud has taken place, is arising or is likely to occur. In response to this information, Incentive FM Group Ltd will decide how to respond. Its response will usually involve one of the following steps:

- Investigation by management or internal audit or by disciplinary procedures
- Referral to the police
- Referral to the external auditor

At the conclusion of an enquiry, the investigator will produce a report. The Director/Manager whose responsibility covers the area of that investigation must formally accept the report and take the appropriate action (disciplinary or other).

Conclusion

Incentive FM Group Ltd has in place a clear network of systems and procedures to support it in the fight against fraud, corruption and bribery. It is determined that these arrangements will keep pace with any future developments, in both deterrence and detection techniques, regarding fraudulent or corrupt activity that may affect its operation or related responsibilities.

This Policy will be made available to all Directors, Managers, employees and contractors.

Signed



Mr J. Waud
Managing Director

January 2017