



ANTI FRAUD & BRIBERY POLICY

IMS Building Solutions Limited has a zero tolerance to fraud and corruption and is committed to the prevention of fraud, bribery or any corrupt activity associated with the Company.

The Fraud Act 2006 came into effect in January 2007. The Act introduced a new general offence of fraud which can be committed in three ways;

• **Fraud By False Representation**

A person is in breach of this section if he dishonestly makes a false representation, and intends, by making the representation to make a gain for himself or another, or to cause loss to another or to expose another to a risk of loss. A representation is false if it is untrue or misleading, and the person making it knows that it is, or might be, untrue or misleading. "Representation" means any representation as to fact or law, including a representation as to the state of mind of the person making the representation, or any other person. A representation may be expressed or implied. For the purposes of this section a representation may be regarded as made if it (or anything implying it) is submitted in any form to any system or device designed to receive, convey or respond to communications (with or without human intervention).

• **Fraud By Failing To Disclose Information**

A person is in breach of this section if he dishonestly fails to disclose to another person information which he is under a legal duty to disclose, and intends, by failing to disclose the information to make a gain for himself or another, or to cause loss to another or to expose another to a risk of loss.

• **Fraud By Abuse Of Position**

A person is in breach of this section if he occupies a position in which he is expected to safeguard, or not to act against, the financial interests of another person, dishonestly abuses that position, and intends, by means of the abuse of that position to make a gain for himself or another, or to cause loss to another or to expose another to a risk of loss. A person may be regarded as having abused his position even though his conduct consisted of an omission rather than an act.

IMS Building Solutions Limited require all employees including any employed on a temporary, agency or contractor basis to act honestly and with integrity, comply with the laws, regulations and customs of each country in which the Company operates and to conduct business with clients, suppliers and all other parties in an ethical, lawful and responsible manner.

The offering, giving, solicitation or acceptance of any bribe or cash inducement to or from any person, company or any third party is strictly prohibited by IMS Building Solutions Limited.

This policy recognises the variance in market practice across different countries in which IMS Building Solutions Limited operates, and strictly prohibits any inducement which may result in a personal gain or advantage to the recipient or any associated person or third party which is intended to influence action which may not be solely in the interests of the Company, person or body whom the Company represents.

The giving of ceremonial gifts, normal or appropriate hospitality, or the use of a recognised fast track process available on payment of a fee, provided that they are proportionate, customary within a particular market and properly recorded and openly disclosed are not prohibited providing that they are agreed with senior management or with persons or clients that the Company represents. This policy does not prohibit the offer or use of resources to assist a person or body to make a decision more efficiently providing that they are supplied for that purpose only.

All Employees will be made aware of the Company policy and their personal responsibilities and that they must ensure to adhere strictly to this policy. The responsibility to prevent unethical business practice resides across all levels of the Company, and any suspected instance of such practice will be handled consistently without regard to position held or length of service of the person or persons involved, with the possible consequence of immediate termination of employment.

This policy will be periodically reviewed for continual improvement and relevance. Compliance with this policy will be continually reviewed.

Signed..... (C Meadows) Date.....