



I & H Brown values its reputation for integrity, ethical behaviour and for financial probity and reliability. The Company has zero tolerance for any involvement in fraud and/or bribery.

Fraud:

There are a range of frauds prescribed by the law (both common law and statute) these include:-

- Cheating the public revenue.
- Fraud (when an individual achieves a practical result through intentional false pretences or dishonest misrepresentation).
- Any involvement in blackmail or extortion.
- Uttering (Tendering a forged document as genuine intending to deceive another party).
- Embezzlement (the mis- appropriation of property or mis use of assets or resources without the consent of the owner).
- False accounting including false overtime claims and expenses.
- False statements misrepresenting the true position of the business.
- Fraudulent trading including collusion between bidders in a tender competition to favour a particular bidder.
- Fraud under the Fraud Act 2006.
- Participating in fraudulent business carried out by a sole trader including accepting or offering a bribe or inducement and external fraudulent activities against an organisation.
- Obtaining services dishonestly.

In each case these are criminal activities making the person committing the offence liable to a fine and or imprisonment. Fraud damages and threatens the business. Where fraud is committed and results in economic benefit to the business, the Company is potentially liable for an unlimited fine even in circumstances where management had no knowledge of the fraudulent activity.

The Company will take firm and vigorous action against any employee or third party engaged with the business involved or suspected of being involved in fraudulent activities.

Bribery:

Bribery includes the offering, the giving, the solicitation or the acceptance of any bribe, whether cash, gifts or other inducements. That includes a bribe offered:

- to or from any third-party wherever they are situated (including any individual, business, company, public official or body)
- by any individual employee, agent or other person, business or body acting on the Company's behalf,
- with the intention or result of the gain of any commercial or contractual advantage for the Company and
- to gain any personal advantage, pecuniary or otherwise.

If you bribe or attempt to bribe another person, intending either to obtain or retain business for the Company, or to obtain or retain an advantage in the conduct of the Company's business this will be considered gross misconduct. Similarly, accepting or allowing another person to accept a bribe will be considered gross misconduct. In these circumstances, you will be subject to formal investigation under the Company's disciplinary procedures and disciplinary action up to and including dismissal may result.

The Company has established and maintains strict adherence to internal control procedures to prevent fraud and/or bribery, and all employees of the Company are required to act with honesty and integrity in all of their business dealings on behalf of the Company.

**Gifts, Entertainment and Hospitality:**

The Company prides itself in the business development activity that it undertakes. This policy is not intended to prohibit the following practices providing that they are customary in a particular market, are proportionate and are properly recorded, where appropriate. This will include normal and appropriate hospitality, including gifts and entertainment; the giving of a ceremonial gift on a festival or at another special time; the offer of resources to assist the person or body to make the decision more efficiently if they are supplied for that purpose only.

Gifts:

- No employee may give, or accept, gifts without prior approval from their Manager. Where the gift is in excess of £500, approval must be sought from a Director.
- No gift of cash/cash equivalent may be accepted or offered without the prior approval of their Manager or Director.
- Gifts in excess of £500 should be recorded in the Company's Gifts and Entertainment Register.

Entertainment/Hospitality:

- No employee may accept or offer any entertainment or hospitality without prior approval from their Manager. Where the entertainment or hospitality is in excess of £500, approval must be sought from a Director.
- All entertainment/hospitality valued in excess of £500 should be recorded in the Company's Gifts and Entertainment Register.

If you are in doubt about the appropriateness of a gift, entertainment or hospitality offered to you before accepting, you should seek guidance from the HR Dept.

The Company's Gifts and Entertainment Register held by the HR Dept and is reviewed regularly by the Main Board of Directors to assess frequency and value. The prevention, detection and reporting of fraudulent/bribery activities is the responsibility of all employees via the Company's Whistleblowing Policy.

J SCOTT BROWN
MANAGING DIRECTOR

Date: June 2026