

### Policy summary

Sunsynk UK LTD (The Company) has a 'zero tolerance' policy towards fraud, bribery and corruption. It will always seek to take disciplinary and /or legal action against those found to have perpetrated fraud (para 7).

The Company is committed to developing an anti-fraud culture and keeping the opportunities for fraud, bribery and corruption to the absolute minimum (para 8).

The Company will assess the risks of fraud, bribery and corruption, establish processes and controls to minimise these risks, and regularly review the effectiveness of its control systems (paras 11 and 15).

The Company requires all staff to immediately report any incidents or suspicions of fraud, bribery or corruption to an appropriate manager or another person named in Raising Concerns. The Company will not penalise anyone for raising a concern in good faith (paras 16, 17 and 19).

The Company will take all reports of fraud, bribery and corruption seriously, and investigate proportionately and appropriately as set out in the Fraud Response Plan (para 21).

The Company requires all those representing The Company, including its suppliers, partners, contractors and agents, to act in accordance with this policy. This includes reporting to The Company any suspected or actual instances of fraud, bribery or corruption involving The Company assets or staff (paras 6 and 18).

## Introduction

1. The Company complies with applicable legislation, including the Fraud Act 2006, the Bribery Act 2010, and with other regulatory requirements when applicable.
2. The Company is committed to conducting business fairly, openly and honestly and in accordance with the highest ethical and legal standards.

## Purpose

3. The purpose of this policy is to set out the Company's stance on fraud, bribery and corruption and its approach to preventing, detecting, reporting and investigating fraud, bribery and corruption.

## Scope

4. This policy applies to the Company and its Employees, Directors & Shareholders.
5. This policy is applicable to, and must be followed by, all staff including consultants and contractors. Failure to comply could result in disciplinary action, including dismissal.
6. The Company requires all those representing the Company, including its suppliers, partners, contractors and agents, to act in accordance with this policy.

## Policy

### Policy Statement

7. The Company has a 'zero tolerance' policy towards fraud, bribery and corruption. This means that the Company:
  - a) does not accept any level of fraud, bribery or corruption within the organisation or by any other individual or organisation working with the Company  
;and
  - b) will always seek to take disciplinary and/or legal action against those found to have perpetrated, be involved in, or assisted with fraudulent or other improper activities in any of its operations.
8. The Company is committed to developing an anti-fraud culture and keeping the opportunities for fraud, bribery and corruption to the absolute minimum.
9. The Company requires all staff to act honestly and with integrity always and to safeguard the resources for which they are responsible.

## Risk and internal control systems

10. The Company will seek to assess the nature and extent of its exposure to the risks of internal and external fraud, bribery and corruption. It will regularly review these risks, using information on actual or suspected instances of fraud, bribery and corruption to inform its review.
11. The Company will seek to put in place efficient and effective systems, procedures and internal controls to: encourage an anti-fraud culture; prevent and detect fraud, bribery and corruption; and reduce the risks to an acceptable level.
12. The Company will seek to equip its staff with the skills, knowledge and expertise to manage its fraud risk effectively. It will provide adequate training to make staff aware of the risks of fraud, bribery and corruption, and of their responsibilities in preventing, detecting, and reporting it.
13. The Company will make all those in regular contact including its suppliers, partners, contractors and agents aware of this policy.
14. The Company will work with relevant stakeholders, including comparable organisations, relevant regulators and government organizations to tackle fraud.
15. The Company will regularly review and evaluate the effectiveness of its systems, procedures and internal controls for managing the risk of fraud. It will do this through risk management and assurance processes and audit arrangements.

## Reporting - internal

16. All staff must immediately report any suspected or actual instances of fraud, bribery or corruption. This includes offers to pay bribes, solicitation of bribes and demands to make facilitation payments. Failure to report could result in disciplinary action.
17. Reports should be made to an appropriate manager. If staff are not comfortable reporting their concerns to these people then they should report it directly to the Managing Director.
18. The Company also requires all those representing the Company, including its suppliers, partners, contractors and agents, to report any suspected or actual instances of fraud, bribery or corruption involving Company assets or staff. Reports should be made to the Managing Director.
19. The Company will not penalise anyone for raising a concern in good faith, even if it turns out to be unfounded. Any member of staff who harasses or victimises someone for raising a concern in good faith will themselves be subject to disciplinary action.
20. The Company will maintain a system for recording: all reports of actual or suspected fraud, bribery and corruption; the action taken; and the outcome of any investigation. It will use this information to inform its review of the risks and the effectiveness of its controls.

### Reporting – external

21. The Company will fully meet its obligations to report fraud, bribery and corruption to third parties.

### Investigation

22. The Company will take all reports of actual or suspected fraud, bribery and corruption seriously, and investigate proportionately and appropriately.
23. The Company will make it their priority to investigate fraud, bribery and corruption.
24. The Company will always seek to take disciplinary and/or legal action against those found to have perpetrated or assisted with fraudulent or other improper activities in any of its operations. For staff, this may include dismissal. It will also seek to recover any assets lost through fraud.

### Approval of losses

25. All losses as the result of fraud will be recorded on the loss register and approved in compliance with the Company's delegated authorities.

### Specific risk mitigation measures

26. To manage the exposure to bribery and corruption, all gifts and hospitality received by staff and given to Public Officials must be approved in line with the delegated authorities and recorded on the Gifts and Hospitality Register.
27. Conflicts of interest are known to increase the risk of fraud. Therefore all staff who have an interest in an actual or potential customer or supplier (whether personally, or through family members, close friends or associates) must report that conflict of interest to their manager.

### Responsibilities

28. The **Directors** are the owners of the Company's counter fraud work and the counter fraud champion is designated periodically.
29. The **Directors** are responsible for creating and implementing the Company's counter fraud strategy and for managing the counter fraud function.
30. The **Directors** are responsible for recording all instances of actual or suspected fraud, bribery and corruption, ensuring that they are investigated proportionately and appropriately, and reported to external parties. They are also responsible for providing advice and training to staff on preventing, detecting and investigating fraud. This includes investigating cases where specialist input is required due to the complex nature of the case.

31. The **Directors** are responsible for ensuring that all staff are aware of and support this policy and that all incidents of fraud, bribery or corruption are reported. They are also responsible for ensuring that all incidents of fraud, bribery or corruption are managed and investigated in line with this policy.
32. **Managers** receiving reports of fraud, bribery and corruption are responsible for reporting them to the Directors, and agreeing with them how the case will be managed and who will be responsible for the investigation.
33. **All staff** are responsible for complying with this policy.

### Definitions

34. **Fraud** is knowingly making an untrue or misleading representation with the intention of making a gain for oneself or another or causing a loss, or risk of loss, to another.
35. **Bribery** is giving or offering someone a financial or other advantage to encourage that person to perform their functions or activities improperly, or to reward someone for having already done so.
36. A **facilitation payment** is a type of bribe. An example is an unofficial payment or other advantage given to a public official to undertake or speed up the performance of their normal duties.
37. **Corruption** is the misuse of entrusted power for personal gain. This would include dishonest or fraudulent behavior by those in positions of power, such as managers or government officials. It would include offering, giving and receiving bribes to influence the actions of someone in a position of power or influence, and the diversion of funds for private gain.
38. A **conflict of interest** is where an individual has private interests that may or actually do influence the decisions that they make as an employee or representative of an organisation.