

STATEMENT

This TRAD Policy has been assembled to protect Company operations, customers, shareholders, employees and the general public from the adverse effect of fraudulent and dishonest behaviour.

Note: this Policy is underpinned by ALTRAD group policies, including the ALTRAD Code of Conduct, also available on our website.¹

Relevant ALTRAD Group policies include:

- Anti-Bribery & Corruption Policy
- Business Integrity & Ethics Code
- Compliance PU Guidelines
- Conflict of Interests Policy
- Corruption Risk Mapping Methodology
- Counterparty due diligence policy
- Ethic and Integrity Framework
- Expectations of our Suppliers
- Finance Policy 3 expenses
- Finance procedure 2.0 Capex requests
- Gifts and Entertainment Policy
- Local Compliance Officer - Delegation of authority
- Local Compliance Officer - Scope of duties
- Local Ethics Committee Guide
- Modern slavery and human trafficking policy
- Whistleblowing Policy

TRAD always requires all staff to act with honesty, integrity and to safeguard the resources for which they are responsible. Fraud, theft, bribery, and malpractice is an ever-present threat to these resources and TRAD will ensure that we enforce all control measures and work in compliance with the law. Fraud, theft, bribery, and malpractice is the deliberate action by a person, or allowing action to be taken by another, for the purpose of, or intention of:

- Obtaining money, assets or services;
- Distorting business performance;
- Causing loss to the company, supplier or employee;
- Depriving an employee or member of the public of their rightful goods or property;
- Accepting high value gifts or inappropriate hospitality;
- Giving high value gifts or inappropriate hospitality for the intention of bribery;
- Prejudicing the company's competitive position or business reputation;
- Money laundering;
- Unauthorised release of confidential information;
- Employment of illegal immigrants, those working under an assumed name or anyone unauthorised to work or carry on business in the UK.

Fraudulent and dishonest behaviour can result in substantial cost to the company, loss of business and damage to our reputation. This Policy applies to all TRAD employees, directors, contractors and consultants, who will be made aware during induction and in briefings of their duties and responsibilities.

Please note that the TRAD Scaffolding Contractors is a business name of TRAD Scaffolding Co Limited; Registered Office: Albion Road, Dartford, Kent, DA1 5PZ. Registered in England No. 1031385.

Any such incidents must be reported to the relevant line manager, who will escalate it where required to the Ethics Committee (which include the HR Director, Managing Director, and Ethics Officer) who will where required convene a meeting to discuss and decide on appropriate actions, and anyone “whistleblowing” will be protected, as it is in the best interests of the company to prevent any form of bribery or wrongdoing.

Directors will regularly check for anti-competitive behaviour including cover pricing and bid rigging to ensure all tenders are tendered competitively. All directors/managers/supervisors must personally speak to their MD who will authorise the cost of any gifts or hospitality to clients, the cost of which must be inexpensive (with gifts, where practicable, to be TRAD diaries, pens and calendars).

Note: please speak to the Finance Director for advice where required.

Similarly, directors/managers/supervisors must refuse all inappropriately costed gifts from subcontractors and when in doubt must personally speak to their MD who will decide on appropriate action (such as passing on inappropriate gifts to charities).

As a basic principle any transaction resulting from a business relationship designed to achieve personal gain to a member of staff or their family is expressly forbidden. Employees are forbidden to accept gifts from suppliers other than small promotional items with a nominal value such as (inexpensive) pens, diaries and calendars.

The following types of HOSPITALITY must not be accepted:

- Use of donor’s property;
- Tickets for events or function at which the donor is not present;
- Any type of level of entertainment which is outside the bounds of accepted business hospitality;
- Extension of business trips for leisure purposes paid for by the host;
- Visits to any location which does not have a genuine business purpose. The only exceptions are modest hospitality such as business lunches which are viewed as a courtesy of a business relationship and which, at some point, where practical should be reciprocated;
- Employees must not under any circumstances allow themselves to be entered for any competition run, administered or in any way controlled by a supplier.

The following types of PAYMENT are strictly prohibited:

- Cash inducements;
- Payment of travel and accommodation expenses for employees or for their family members;
- Payment of any employee’s normal business travel and accommodation expenses;
- Payments to subsidise private events or activities.

TRAD will ensure that all suppliers are made aware of this policy and the ALTRAD Group Policies, including the ALTRAD Code of Conduct (e.g., by email and including attaching links to our TRAD website) and that all employees are made aware of this policy (by memos and briefings). All suppliers will be required to acknowledge that they have read, understood, and will always comply with the policy where required.

Note: this Policy will be reviewed when ALTRAD update their policy, but this policy will not be revised and re-issued unless there are significant updates.

The supplier and any person, organisation or company working on their behalf will comply with this policy (and with the spirit of the policy). The supplier must inform the MD if the supplier, or any

person, organisation or company acting on their behalf has any personal connection which may materially influence transactions. In the event of a failure to comply with the policy, TRAD will be entitled to terminate all contractual relationships with the supplier without payment or compensation and that in such circumstances all rights of TRAD will be reserved.

Everyone – including employees, directors, officers, consultants, contractors, agents, representatives, business partners, sponsors, interns, casual workers, seconded workers and agency workers – has a role to play in preventing, detecting and reporting dishonest and unlawful behaviour.

You must:

- Carry out your duties in such a way as to prevent fraud, theft, bribery and malpractice;
- Immediately report any suspicion of dishonest behaviour to your line manager, or Managing Director/Director, who will report to the Ethics Committee.

The MD and Ethics Committee will ensure that:

- Every reported incident of dishonest behaviour will be investigated;
- The confidence of those reporting the incident or suspicion of fraud etc will be respected;
- Where appropriate, the investigation will be carried out either internally by Managers, appointed by the MD and Ethics Committee, having no operational responsibility within the business unit implicated, or externally by an appointed agency reporting to the MD and Ethics Committee;
- For serious breaches, or where an internal/external investigation is deemed inappropriate, then the police and/or other authorities will be contacted immediately.

In all cases the MD, in consultation with the Ethics Committee, will take the decision as to whether the police or other authorities should be brought into the investigation.

Whistleblowing

We are committed to upholding all laws relevant to countering bribery and corruption, and complying with our parent company's Whistleblowing Policy.

At TRAD we,

- encourage TRAD employees and the related third parties (Whistleblower) to report suspected wrong-doing as soon as possible;
- reassure Whistleblowers that their concerns will be taken seriously and investigated, and that their confidentiality will be respected;
- provide Whistleblowers with guidance as to how to raise their concerns; and,
- re-assure Whistleblowers that they can raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

Whistleblowing is the disclosure to TRAD of information which relates to suspected dangers at work or wrongdoing. These may include:

- breach of, default of or behaviours contrary to, this policy and the ALTRAD Group's Business Integrity & Ethics Code, with respect to bribery or corruption and/or any other internal ALTRAD or TRAD policy (anticorruption policies, conflicts of interest policy, etc.);
- dangers to the health and safety of TRAD employees and others;
- financial fraud or mismanagement;
- criminal activity or offences;
- a clear and serious violation of applicable laws or regulations;
- a clear and serious infringement of laws of any international organization that has been subsequently adopted locally in the applicable country;
- a serious threat or the causing of serious damage to the public interest of which the Whistleblower had personal knowledge;
- damage to the environment;
- conduct likely to damage ALTRAD and TRAD's reputation;
- unauthorised disclosure of confidential information; and/or,
- the deliberate concealment of any of the above matters.

A Whistleblower is an individual who has personal knowledge of the facts reported. He/she must not act as an intermediary for another employee who refuses to make a report and cannot simply repeat information already disclosed. The concern shall be raised in a disinterested manner and in good faith, i.e., without malicious intent and without malice, in the general interest without seeking the satisfaction of any particular interest, financial or otherwise, with a genuine concern about dangers at work or any wrongdoing (as set out above).

In many cases it will be possible to raise concerns with the line manager (in person or in writing). Where this is not possible, then they should inform the Ethics Committee by speaking to their Managing Director or by:

- texting the Near Miss, PEP, Whistleblowing Text Line.

Declaration

TRAD is fully committed to ensuring compliance both with the letter and spirit of the principles of this Policy. For that reason, Mr McShane has been appointed with the responsibility and authority to oversee and drive compliance. TRAD Managing Director, Divisional Directors and Managers are committed to continual improvement and this Policy will be reviewed annually and the Policy will be disseminated throughout the company and supply chain as required.

For and on behalf of TRAD:²

Peter McShane,
TRAD Scaffolding Contractors
Managing Director



Dated: as front page

Craig Hayes,
TRAD,
Divisional Director



Dated: as front page

Darren Clinton,
TRAD,
Divisional Director



Dated: as front page

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