

TRAD GROUP POLICY
<h1 style="margin: 0;">FRAUD, THEFT, BRIBERY AND MALPRACTICE POLICY</h1>

REV	DATE	STATUS / DESCRIPTION OF CHANGES
03	23-Feb-18	General revision and removal of MTD name (as this company was purchased by TRAD Scaffolding Contractors)
02	26-Jul-17	General revision
01	22-May-16	Inclusion of ALTRAD MTD Limited into the TRAD Group
00	01-Apr-16	First issue (amalgamation of TRAD Sister Companies' existing Policies into a Group Policy)

DOCUMENT NO.	TRAD-POL- 003
---------------------	----------------------

STATEMENT

This Group 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 TRAD Group Policy (underpinned by the ALTRAD Code of Conduct) is applicable to every company within the Trad Group: Trad Scaffolding Contractors, Trad Hire & Sales Ltd, and Trad Safety Systems Ltd, and all TRAD companies will ensure full compliance.¹ The word “company” will be used throughout as every one of the TRAD companies has slightly different procedures and processes, which nonetheless adhere to policy.

The Group requires all staff at all times 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 group/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 group/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 Group, 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.

Any such incidents must be reported to the MD, Director or Group CEO (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 Group to prevent any form of bribery or wrongdoing.

All MD’s/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 also personally speak to their respective 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).

Similarly, directors/managers/supervisors must refuse all inappropriately costed gifts from subcontractors and when in doubt must personally speak to their respective 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

¹ Please note that TRAD Scaffolding Contractors is a brand name for TRAD Scaffolding Co Limited.

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 (by email and including attaching this policy statement on TRAD's 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 comply with the policy at all times where required.¹ 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 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 Managing Director/Director who will report to the Group CEO.

The Group CEO 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 Group CEO, having no operational responsibility within the business unit implicated, or externally by an appointed agency reporting to the Group CEO;
- 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 Group CEO will take the decision as to whether the police or other authorities should be brought into the investigation.

Declaration

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

For and on behalf of the TRAD Group

Signed: Hard copy signed in office
Des Moore, TRAD Group CEO

Dated: as front page

Signed: Hard copy signed in office
John Patterson, TRAD Hire & Sales, Managing Director

Dated: as front page

Signed: Hard copy signed in office
Jim Gorman, TRAD Safety Systems, Managing Director

Dated: as front page

Signed: Hard copy signed in office
Neil Garner, TRAD Scaffolding Contractors, Managing Director²

Dated: as front page

² Please note that TRAD Scaffolding Contractors is a brand name for TRAD Scaffolding Co Limited.