

<p>WATKINS POLICY</p> <p>W-05</p>	 <ul style="list-style-type: none"> <li>■ mechanical</li> <li>■ electrical</li> <li>■ plumbing</li> </ul>
<p>ANTI-FRAUD AND CORRUPTION STRATEGY POLICY STATEMENT</p>	

## 1. Preamble

The nature of Watkins M&E Group (and its subsidiaries) is such that the prevention and detection of fraud against the company and those with whom it conducts its business, is something that all employees must be alive to and ensure that all company assets are protected.

The policy outlines the principles which will be pursued in respect of all employees of the company, contractors, sub-contractors and anyone who, from time to time, will be required to work for or on behalf of the company.

## 2. Policy

The Company's attitude towards fraud and corruption is encapsulated below:

- a) Watkins M & E Ltd is determined that the culture and tone of the organisation is one of honesty and opposition to fraud and corruption. The Company will not tolerate fraud and corruption in the administration of its work whether from inside the company or external to it.
- b) The company is committed to an effective anti-fraud and corruption strategy. The key elements are outlined below.
- c) The Company's expectation as to probity and accountability is that members of staff at all levels will lead by example by ensuring the adherence to legal requirements, rules, procedures and practices.
- d) Directors, Senior Managers and line managers are expected to deal swiftly and firmly with those who defraud the company or who are corrupt.
- e) The company also expects the individuals and organisations, for example suppliers, contractors, subcontractors, service providers, etc, that it comes into contact with, will act towards that company with integrity and without thought or actions involving fraud or corruption.

Date created: April 2015		Authorised by: Director
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### 3. Strategy

The strategy will be to commit appropriate resources and put into place a series of inter-related procedures designed to frustrate any attempted fraud or corrupt acts and to move to investigate any instances or suspected instances which may arise.

#### 3.1 Measures

The company, through the Directors, will retain appropriate procedures and documentation to ensure the awareness of all staff as to the company's requirements. The Company will retain financial and other controlled measures which will be subject to internal and external audit as may be agreed with the Auditors.

#### 3.2 Detection and Investigation

The Company will investigate actual and suspected cases of fraud or corruption and follow up with disciplinary procedures where appropriate. Specifically:

- a) staff are required to report all suspected irregularities to their Senior or line managers in the department for whom it is their duty to initiate the necessary investigations by one of the Directors
- b) The Company's disciplinary procedures may be used where the outcome of the investigation indicates improper behaviour.
- c) Where financial impropriety is discovered and sufficient evidence exists to suggest that a criminal offence may have been committed, the Company may refer the matter for Police investigation.

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