

## Anti-Fraud, Bribery & Corruption Policy

The implementation of this Policy is mandatory to ensure that Bayanix management and workers have the knowledge, skills and competence to design, plan, manage or carry out work with due diligence to the protection of staff and others from fraud, bribery and corruption.

### 1.0 Introduction

Bayanix is committed to sound governance arrangements. In managing its arrangements and responsibilities the Company, is determined to ensure proper accountability and probity in delivering its stated business aims and objectives.

This Anti-Fraud, Bribery and Corruption Policy brings together existing key policy and procedure documents that are designed to: -

- help prevent fraud, bribery and corruption
- promote early detection and ensure its effective investigation
- where appropriate ensure the recovery of any financial loss.

### 2.0 Fraud, Bribery and Corruption

The term fraud encompasses a range of acts and can include:

- criminal deception
- forgery
- blackmail / bribery
- theft including the obtaining of a pecuniary advantage for a third party, i.e. financial gain or a reduction in a debt or liability
- the intentional changing of financial statements or other records by persons inside or outside the Company which is carried out to conceal the theft of assets or otherwise for gain
- conspiracy and the concealment of material facts.

Bribery is “the receiving or offering of undue reward to persons in order to influence their behaviour contrary to ordinary standards of integrity and honesty”.

Corruption can be defined as the “offering, giving, soliciting or acceptance of and inducement or reward, which may influence the action of any person.

#### Proper Standards

Employees have a duty to adhere to and comply with local Codes of Conduct.

The Company is committed to ensuring that employees receive suitable training and continuing professional development in order to assist them in the delivery of their duties.

### 3.0 Culture

The Company supports and promotes zero tolerance to any form of fraud, bribery, corruption or irregularity and will pursue perpetrators to the full extent of the law. It expects all members of the Company, to uphold the highest standards of integrity in their dealings for, and on behalf of, the Company.

### 4.0 Policies and Procedures

In order to promote a strong anti-fraud, bribery and corruption culture and infrastructure of preventative measures have been adopted in the form of policies and procedures that employees are required to comply with.

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Key policy and procedures include:

- Code of Conduct for employees
- Financial Procedures
- Human Resource policies including recruitment and disciplinary procedures

### 5.0 Reporting

The ethical framework above requires employees to report any concerns they may have regarding potential fraud, bribery or corruption.

The Company's Whistleblowing (Confidential Reporting) Policy provides a route for raising concerns with the Company and detail the safeguards and support available.

Specific guidance is provided to employees relating to the requirement to report suspected cases of fraud, bribery or corruption and the initial actions they should undertake.

### 6.0 Investigation

Investigation into fraudulent, bribery or corrupt activity will normally be carried out by the Internal Audit Service who will liaise with Finance, and the Police where necessary.

Where there is evidence of suspected fraud, bribery or corruption, following discussion with Finance, Internal Audit will refer the matter to the Police who will determine if a criminal investigation is appropriate.

The Company will always seek to recover losses incurred as a result of any fraud, bribery or corruption.

### 7.0 Review

The Company will ensure that this policy and strategy document is subject to regular review to ensure its accuracy.

Company policies and procedures outlined within this document are also subject to regular review.

### 8.0 Sharing Information

The Company is committed to working with other agencies in the detection and prevention of fraud.

### 9.0 Contacts

Further advice or assistance can be obtained from the following: -

Bayanix Limited  
150 Minories  
London  
EC3N 1LS  
0207 871 1330

[Info@bayanix.co.uk](mailto:Info@bayanix.co.uk)

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### Policy Statement

The Company is committed to ensuring that quality services are developed and delivered for the benefit of all.

To assist in this goal the Company will take all necessary steps to ensure that the public's assets and interests are protected.

The Company will:

- promote a fair, equitable and honest approach to service delivery with those providing and receiving those services
- actively seek out instances of fraudulent and corrupt practices and pursue the perpetrators to the full extent of the law
- encourage people with concerns about potential fraud, bribery and corruption to inform the Company of their suspicions
- treat complaints of potential fraud, bribery and corruption positively, fairly and equitably
- regularly review its own procedures to ensure they offer effective protection of the Companies interests and reputation.

Delivery of these aims requires the establishment, communication and maintenance of:

- proper standards
- an anti-fraud cultures
- supporting policies and procedures
- reporting and investigation arrangements
- access to information and publicity
- review mechanisms
- data sharing arrangements



Neal Bailey  
Director  
Bayanix Limited

Date: 15<sup>th</sup> March 2024

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### ANTI FRAUD & BRIBERY PROCESS

#### 1.0 PURPOSE

This procedure sets out the process for preventing bribery within the business. Bribery is to offer, provide or receive something of value, including cash, gifts, hospitality or entertainment as an inducement or reward for something improper.

#### 2.0 SCOPE

The procedure is applicable to all activities undertaken by Bayanix Limited and is proportionate to the nature, scale and complexity of the business.

#### 3.0 REFERENCES

Bribery Act 2010

#### 4.0 DETAILS OF PROCEDURE

Under the Bribery Act 2010, the business is required to have adequate procedures in place to mitigate the risk of bribery.

##### Top-Level Commitment

There is a commitment from top level management to prevent bribery within Bayanix's activities, which is in the form of the Anti-Bribery & Corruption Policy.

##### Risk Assessment

A risk assessment has been carried out to ascertain the level of risk of bribery taking place within the company:

- The Country risk is very low, as all of Bayanix's business takes place within the UK
- Sector risk is high, as Bayanix operates in the construction industry, which is at higher risk of bribery practices
- Transaction risk is low, as there are no charitable or political donations involved
- Opportunity risk is medium, as there is a tender process involved
- Partnership risk is low, as work does not involve interaction with public officials
- Perceived pressure at work is high, due to turnover being in excess of £1million

The total score of 37/110 puts Bayanix in the **low risk** category.

##### Due Diligence

Any sub-contractors working on behalf of Bayanix will be required to provide a copy of their Anti-Bribery Policy as part of the supply chain assessment process.

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### Facilitation Payments

Bayanix will not make facilitation payments, nor allow others who work on our behalf to make them. Bayanix makes no distinction between facilitation payments and bribes. Any type of facilitation payment, large or small, is prohibited.

### Gifts and Hospitality

Bayanix will ensure that all gifts and hospitality are within reasonable, proportionate limits and will never accept anything that could be perceived as a bribe or as an attempt to inappropriately influence a business decision.

All gifts, hospitality and financial transactions must be recorded accurately, completely and transparently. Gifts and hospitality must be recorded on our Gifts & Hospitality Register.

Bayanix will not:

- Offer or accept gifts or hospitality that might impair our or others' objective judgement, improperly influence a decision or create a sense of obligation, or if there is a risk that they could be misconstrued or misinterpreted by others.
- Accept any gift or hospitality which is offered for something in return
- Give or accept gifts of cash, or cash equivalent (such as gift cards or gift vouchers).

## 5.0 TRAINING

All employees receive training on the Bribery Act and this procedure as part of the onboarding process. This is refreshed on an annual basis.

## 6.0 REVIEW

The Bribery Risk Assessment, policy and procedure will be reviewed as part of the Management Review to ensure it remains up to date and effective.

## 7.0 GUIDANCE

Ministry of Justice: The Bribery Act 2010 Quick Start Guide

## 8.0 FORMS

IMS-REG-020 Gift & Hospitality Register

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