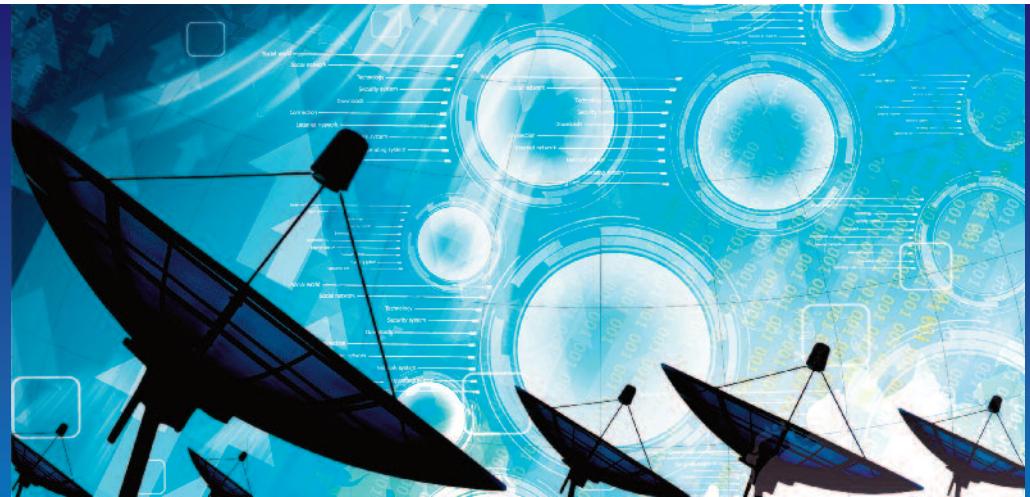


# Anti-Fraud, Bribery and Corruption Policy Statement



## Introduction

Sorinteq is determined to maintain its reputation as a company which will not tolerate fraud, bribery, corruption or abuse of position for personal gain, wherever it may be found in any area of company activity.

The purpose of this Policy Statement is to set out for Sorinteq employed staff, and consultants paid by Sorinteq, the main principles for countering fraud, bribery and corruption. The policy links closely to the companies vision and supports the Sorinteq values of openness, honesty and performing to the highest standards.

### The Policy statement includes:-

- the scope;
- the culture and the stance against fraud and corruption;
- how to raise concerns and report financial malpractice;
- the principle of having a Sorinteq anti-fraud, bribery and corruption strategy;
- the responsible officer.

All staff and Consultants should play a key role in counter-fraud initiatives. This includes providing a corporate framework within which counter-fraud arrangements will flourish, and the promotion of an anti-fraud culture across Sorinteq. This should provide a sound defence against internal and external abuse of Sorinteq funds.

## Definition of Fraud, Bribery and Corruption

The Chartered Institute of Public Finance and Accountancy (CIPFA) defines Fraud as the;

"intentional distortion of financial statements or other records by persons internal or external to the organisation, which is carried out to conceal the misappropriation of assets or otherwise for gain."

The Fraud Act 2006 further defines fraud in three classes

- False representation
- Failure to disclose information where there is a legal duty to do so
- Abuse of position

## CIPFA defines Corruption as the

"offering, giving, soliciting or acceptance of an inducement or reward which may improperly influence the action of any person."

**The Theft Act 1968 defines theft as**

"a person shall be guilty of theft if he dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it"

**CIPFA defines Bribery as**

"an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage"

**Scope**

The Policy Statement applies to all staff (full time, part time, temporary and casual) who work for the company Sorinteq. The term "staff" includes all types of employees and consultants working to Sorinteq and whom are paid by Sorinteq.

Sorinteq expects that individuals and organisations (e.g. partners, suppliers, contractors, and service providers) that it deals with, will act with integrity and without thought or actions involving fraud, bribery and corruption. Where relevant, Sorinteq will include appropriate clauses in its contracts about the consequences of fraud, bribery and corruption; evidence of such acts are most likely to lead to a termination of the particular contract and may lead to prosecution.

The Anti-Fraud, Bribery and Corruption Policy Statement and Strategy are commended to Sorinteq's Partner organisations, with the expectation that they will be applied either wholly or as the basis for their own local version.

**Culture and Stance Against Fraud and Corruption**

Responsibility for an anti-fraud culture is the joint duty of all those involved in giving political direction, determining policy and management. The strategy should be directed against fraud and corruption whether it is attempted against Sorinteq from outside or from within its own workforce.

Sorinteq expects that staff and associates at all levels will lead by example in ensuring adherence to legal requirements, contracts procedure rules, financial procedure rules, codes of conduct and best (professional) practice.

As part of this culture, Sorinteq will provide clear routes by which concerns can be raised by both staff and consultants, and those outside who are providing, using or paying for our services.

Senior Management is expected to deal swiftly and firmly with those who defraud Sorinteq or who are corrupt. Sorinteq Senior Management will be robust in dealing with financial malpractice.

**Raising Concerns**

Although this document specifically refers to fraud and corruption, it equally applies to any forms of malpractice that can reduce public confidence in Sorinteq and its services, and may also include acts committed outside of official duties but which impact upon Sorinteq's trust in the individual concerned. Examples may include, the criminal acts of theft of "property", which includes all assets and cash; false accounting; obtaining by deception; pecuniary advantage by deception; computer abuse and computer crime. Also, it includes bribery and corruption. Staff and Consultants can be exposed to a number of "pressures", from customers; this may involve "favouritism" regarding the access to all kinds of services and benefits, e.g. discounts or preferential treatment.

Sorinteq staff are an important element in the company stance on fraud, bribery and corruption, and they are positively encouraged and expected to raise any concerns that they may have on these issues where they are associated with the company activity.

Sorinteq staff should normally raise concerns through their immediate manager, however it is recognised that they may feel inhibited in certain circumstances. In this

case, staff should contact the Chief Executive. The Sorinteq "Whistleblowing" Policy gives further guidance on how to raise concerns and it gives details about the support and safeguards that are available to those that do raise concerns.

### Action Sorinteq Will Take

All concerns will be treated in confidence and will be investigated promptly and fully in a professional manner. It should be noted that an allegation does not mean the individual person or company is guilty of any wrong-doing, and so they will not be treated as such until the case is proven.

**If fraud, bribery or corruption has taken place, Sorinteq will, in appropriate cases**

- prosecute the individual(s) or refer the case to the police
- take appropriate disciplinary action where it involves an employee and this may lead to dismissal
- pursue recovery for any financial loss

There is, of course, a need to ensure that the investigation process is not misused, therefore, any internal abuse, such as raising malicious or vexatious allegations, may be dealt with as a disciplinary matter.

### Anti-Fraud and Corruption Strategy

This Policy Statement also forms an important part of the Anti-Fraud, Bribery and Corruption Strategy by setting out the tone, culture and expectations Sorinteq, as part of the company framework.

The Strategy is concerned with both operational activity to detect and investigate fraud, bribery and corruption and also pro-active actions to deter and prevent fraud and corruption through the development of an anti-fraud and corruption culture.

### The Responsible Officer

The Chief Executive of Sorinteq is responsible for ensuring that the company has control systems and measures in place "to enable the prevention and detection of inaccuracies and fraud, and the ability to reconstitute any lost records". An Anti-Fraud, Bribery and Corruption Policy Statement and Strategy helps towards discharging part of this responsibility.

Sorinteq has delegated to the Chief Executive, the responsibility for maintaining "an adequate and effective system of internal audit of Sorinteq accounting records and its systems of internal control in accordance with proper practices in relation to internal control",

**Accordingly, the Chief Executive of Sorinteq will:**

- take overall responsibility for the maintenance and operation of this Policy;
- promote awareness of the principles and practices it contains;
- maintain records of financial malpractice, including concerns and allegations received, matters arising from audits, investigations and evidence and the outcomes;
- report as necessary to the Shareholders.

**Chief Executive, Sorinteq**

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