

## Anti-Corruption, Fraud and Bribery Policy Statement

Ham Baker Group is committed to conducting its business in an honest and ethical manner, and has a zero-tolerance policy towards fraud, bribery and any form of dishonesty in its transactions.

Ham Baker Group will uphold all laws relevant to countering bribery, fraud and corruption in all the jurisdictions in which it operates. However, no matter where Ham Baker Group, its staff, members (including students) or agents operate, it and they must abide by the laws of the UK, including the Bribery Act 2010, in respect of conduct both at home and abroad.

Bribery and corruption are punishable for individuals by up to ten years imprisonment and or an unlimited fine, and if Ham Baker Group is found to have taken part in corruption it could also face a fine and be excluded from tendering for public contracts, as well as suffering damage to its reputation.

Ham Baker Group could also attract liability under the Bribery Act 2010 if a person associated with it is found to have paid a bribe on its behalf, and Ham Baker Group did not have adequate procedures in place to prevent such conduct. Ham Baker Group therefore takes its legal responsibilities very seriously. Likewise, fraud may lead to civil and/or criminal proceedings.

Any allegation that a member of Ham Baker Group has acted in a manner that is illegal or inconsistent with this Policy will be treated seriously, regardless of the seniority of those involved. Disciplinary action up to and including dismissal or expulsion may result. Where it is believed that a criminal offence may have been committed, the police and other relevant bodies may be informed.

### **Objectives of the Policy**

The aims of this Policy are to:

- a. promote a culture of honesty, integrity and professionalism
- b. set out Ham Baker Group responsibilities, and of those working for or on behalf Ham Baker Group, in observing and upholding Ham Baker Group position on bribery, fraud and corruption; and
- c. provide information and guidance to those working for Ham Baker Group on how to recognise and address bribery, fraud and corruption issues.

### **Application of the Policy**

This Policy applies to the conduct of all members of Ham Baker Group and any third party acting on its behalf, a non-exhaustive list of which includes permanent and fixed term staff, students, consultants, contractors, trainees, seconded staff, homeworkers, casual workers, agency staff, volunteers, interns, agents, sponsors, agents or any other person associated



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with Ham Baker Group, any of its subsidiaries or their employees, wherever they may be located (collectively referred to as 'members') in this Policy.

Ham Baker Group will draw this Policy to the attention of consultants and contractors through its procurement processes, and to its agents, where applicable.

This Policy should be read in conjunction with other Ham Baker Group Policies, Procedures and Regulations such as the:

- a. Financial Regulations
- b. Conflict of Interest Regulations
- c. Consultancy Policy
- d. Whistleblowing Policy and
- e. Disciplinary Procedures

The policies at (a) to (e) above will not apply to external agents, contractors or consultants; however external suppliers of services to Ham Baker Group must still comply with this policy.

### **Bribery**

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. The advantage sought or the inducement offered does not have to be financial or remunerative in nature and may take the form of improper performance of an activity or function.

### **Gifts and Hospitality**

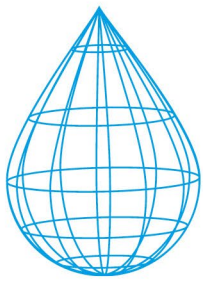
Group financial rules define Ham Baker Group policy towards gifts and hospitality. In either the giving or receiving of gifts or hospitality, there must be no explicit or implicit attempt to influence third parties or be influenced by third parties in relations with Ham Baker Group.

### **What is not acceptable**

It is not acceptable for any member of Ham Baker Group (or someone on their behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure





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- accept payment from a third party that they know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if they know or suspect that it is offered or provided with an expectation that a business advantage will be provided by Ham Baker Group in return
- threaten another member of Ham Baker Group who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

Notwithstanding Ham Baker Group's zero tolerance approach to bribery, the welfare of its staff Ham Baker Group' primary concern, and Ham Baker Group does not require its members to do anything which might jeopardise their health and or safety. In the event that members of Ham Baker Group are threatened or coerced into engaging in conduct which might amount to breach of this Policy, they must act in a way which will safeguard their health and safety. In these circumstances Ham Baker Group will not take action against the member concerned, who should report these events in accordance with section on how to raise a concern below.

Ham Baker only makes charitable donations that are legal and ethical under local laws and practices. No donations of any kind must be offered or made without the prior approval of the Group Managing Director.

### **Fraud**

There is no precise legal definition of fraud. It is generally taken to involve theft - the removal of cash or assets to which the fraudster is not entitled - or false accounting - the falsification or alteration of accounting records or other documents.

Ham Baker Group is potentially exposed Inter alia to:

- External fraud, perpetrated by individuals outside the organisation
- Internal fraud, perpetrated by management or other employees and
- Collusion - either within Ham Baker Group or between staff and outsiders

Ham Baker seeks to apply its funds to its strategic aims. Any loss through fraud will reduce the effectiveness of Ham Baker Group business, and fraud or attempted fraud will be seen as a very serious matter and will lead to disciplinary action being taken against employees, potentially leading to dismissal, and possibly to legal action against all individuals or corporate entities involved in the fraud or potential fraud.

Ham Baker Group will investigate all reports of fraud or potential fraud. These should be reported in the first instance to the General Manager, who will determine, in conjunction with the Group Managing Director, whether there is sufficient evidence or threat to Ham Baker Group to justify further investigation. It may be necessary to preserve confidentiality during investigations and any disciplinary procedures following from the investigation.





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As appropriate, Ham Baker Group will report fraud or attempted fraud to the police. Ham Baker Group will give full assistance to the police in any enquiries.

Ham Baker Group will seek to restore its asset or recover financial losses against fraudsters.

### **Responsibilities**

Ultimate responsibility for this Policy rests with Ham Baker Group Board of Directors to ensure that this Policy is applied effectively.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Ham Baker Group or under its control. All Members of Ham Baker Group are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Any member of Ham Baker Group who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct in the case of an employee, or expulsion from Ham Baker Group for students and visiting academics. Ham Baker Group reserves the right to terminate any contractual relationship with contractors, agents or consultants if they breach this policy.

### **Record Keeping**

Ham Baker Group must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

All staff must declare and keep a written record of all hospitality or gifts in accordance with Ham Baker Group Financial Regulations.

All expenses claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with Ham Baker Group Financial Regulations and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

### **How to raise a concern**

All Members of Ham Baker are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If an individual is unsure whether a particular act constitutes bribery or corruption, or if they have any other queries, these should be raised with their line manager. Concerns should be reported by following the procedure set out in





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Ham Baker Group Whistleblowing Policy, and Ham Baker Group will take all reasonable steps in accordance with that Policy to protect the confidentiality of those raising concerns.

### **Protection**

Ham Baker Group is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any member of Ham Baker Group believes that they have suffered any such treatment, they should inform their line manager immediately. If the matter is not remedied it may be raised formally using Ham Baker Group Grievance Procedure where the individual concerned is an employee.

### **Monitoring and Review**

The Group Managing Director will monitor the effectiveness and review the implementation of this Policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

This Policy does not form part of an employee's contract of employment and is subject to updates.

**David Cardwell**  
Group Managing Director

Created: 3<sup>rd</sup> March 2022  
Review: 3<sup>rd</sup> March 2023

Doc Ref: GD34 v4

