

Fraud & Anti-Bribery Policy

Purpose

Interr requires all staff to act honestly and with integrity at all times and to safeguard the company reputation and assets for which they are responsible.

Interr will not tolerate any fraud or bribery and is committed to ensuring that opportunities for fraud and bribery are reduced to the lowest possible level of risk.

This purpose of this policy is to outline basic requirements for prevention and management of fraud and bribery.

Definition

Fraud is usually used to describe depriving someone of something by deceit intended to result in financial or personal gain. Interr's definition of fraud is any intentional act committed to secure an unfair or unlawful gain to either an employee or a 3rd party.

Bribery is defined as an inducement for an action, which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages.

Detail

- Directors of Interr are responsible for:
 - Implementing an effective control environment to prevent fraud/bribery.
 - Reviewing and testing the control systems for which they are responsible regularly.
 - Assessing the types of fraud/bribery risk involved in the operations for which they are responsible.
 - Ensuring that vigorous and prompt investigations are carried out if fraud/bribery occurs or is suspected.
 - Ensuring this policy complies with your legal and ethical obligations and that all those under your control comply with it.
 - Ensuring Line Managers are implementing this policy and monitoring its use and effectiveness and dealing with any queries on its interpretation.
 - Reporting incidents of fraud/bribery to the Head of HR.
 - Implementing new controls to reduce the risk of similar fraud/bribery occurring where frauds/bribery have taken place.
- Every employee is responsible for:
 - Conducting themselves in accordance with the Employee Handbook and all Company policies..
 - Being alert to the possibility that unusual events or transactions could be indicators of fraud/bribery.
 - Reporting details immediately through to the HR Manager if they suspect that a fraud/bribery has been committed or see any suspicious acts or events.
 - Co-operating fully with internal checks or reviews or fraud/bribery investigations.
- All employees must make declarations in relation to code of ethics (outside interests, anti-bribery, gifts & hospitality, financial crime and convictions), in line with Interr's requirements.
- Employees must ensure that all third parties, including key suppliers, consultants, agents have undergone appropriate due diligence prior to our entering into a relationship with the third party.
- Interr's standard terms and conditions for business with third parties (suppliers, agents, sub-contractors, Affiliates) must include appropriate wording in relation to anti-bribery.
- Interr employees in high risk/sensitive roles (Finance, HR, IT, Risk, Procurement, Directors, Regulated approved persons) will be subject due diligence checks on joining the company/and also whilst an employee. Such checks may include criminal record and anti-money laundering checks.

- Each reported fraud/bribery or suspicion of a fraud/bribery must be escalated and reported to HR Manager immediately. All notifications will be dealt with in the strictest confidence.
- Vigorous and prompt investigations will be carried out into all cases of actual or suspected fraud/bribery discovered or reported. Senior Management may delegate responsibility to line management for undertaking this investigation.
- The Head of HR also needs to record all incidences of fraud/bribery for the purpose of reporting.
- Appropriate legal and/or disciplinary action will be taken against the perpetrators of the fraud. Results and learning from investigations of frauds/bribery will be used to improve the control environment and procedures.

Example bribery indicators

Below is an example list of bribery indicators. This list is not exhaustive.

- Disregard of Interr policy, procedures or guidelines especially in the area of financial control and procurement (i.e. bypassing expense approvals or normal tendering / contractors' procedures).
- Agreeing contracts not favourable to Interr and or our clients.
- Unexplained preference for use of certain contractors either during a tendering period or on a continued ongoing basis
- Avoidance of independent checks on tendering or sub-contracting processes.
- Invoices being agreed in excess of contract amounts without reasonable cause.
- Private meetings with public contractors or companies hoping to tender for contracts.
- Abnormal requests for cash payments.
- Pressure exerted for payments to be made urgently or ahead of schedule.
- Payments being made through 3rd party, i.e. goods or services supplied to company A but payment is being made to company B.
- Abnormally high commission percentage being paid to a third party and/or such payments to be sent to 2 accounts for the same party (often in different jurisdictions).
- Individual never takes time off even if ill, or holidays, or insists on dealing with specific contractors him / herself.

Gifts and Hospitality

This policy is not intended to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded;

- Normal and appropriate hospitality.
- The giving of a ceremonial gift on a festival or at another special time.
- The offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.

Gifts of Alcoholic drinks cannot be drunk under any circumstances in the workplace – not during your working time, not at the end of your shift or before work.

Non-alcoholic drinks can only be accepted when offered and given by a site manager – don't ever accept drinks from other staff. If you are offered a drink and you do not know the position of the person, do not accept it.

You are not permitted to take any drinks from the site other than tap water, or unless you have been advised by site management that the non-alcoholic drinks that you are able to do so.

If you work on a client's site, Any special arrangements with the venue management, i.e. that you are allowed to take a soft drink or a hot drink, must be reported to your Line Manager or Client Director to agree before accepting. If there is an agreement in place and the management changes hands, you are required to inform your Line Manager who will confirm if the agreement still stands.

Any favours offered, i.e. free or discounted drinks and food, items from the site, gifts must be reported to your Line Manager for approval before accepting.

If a gift is offered to you by our client or their staff the following must be adhered to:

- Take the gift to the cleaners cupboard.
- Inform the Line Manager and wait for approval.
- Once the approval has been given, you may take the gift home.

Policy Review

This policy was last reviewed and agreed by the board and seeks to be reviewed and updated annually. Any queries arising regarding this policy should be addressed to Mick Tabori.



Mick Tabori - CEO
October 2017