



**Nurture Landscapes Ltd**  
**Gavin Jones Ltd**

## **FRAUD, BRIBERY & CORRUPTION POLICY**

### **Policy Statement**

The Nurture Group requires all employees to act honestly and with integrity and to safeguard the resources, reputation and confidence for which they are responsible. Fraud, bribery and corruption is an ever-present threat to these resources and hence must be a concern to all members of staff. The purpose of this statement is to set out the responsibilities and commitment with regard to the prevention of fraud, bribery and corruption.

### **What is fraud?**

For Company purposes fraud is to be defined as “the use of deception with the intention of obtaining an advantage, avoiding an obligation or causing loss to another party”.

### **What is bribery and corruption?**

For Company purposes bribery is to be defined as “giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so”.

The following actions are examples of what GJ would view as constituting an offensive act under this policy:

- Theft of company property, including information
- Forgery or alteration of company documents
- Wilful destruction or removal of company records
- Falsification of expense claims
- Unauthorised disclosure of confidential information to outside parties
- Misappropriation or use of company assets for personal gain
- Undertaking or assisting in illegal activity (including money laundering)
- Acceptance of bribes or gifts to favour third parties
- Knowingly generating or paying false claims or invoices.

### **Responsibilities**

**Company** is responsible for:

- Developing and maintaining effective controls to prevent fraud, bribery and corruption.
- Carrying out vigorous and prompt investigations if an offence occurs.
- Taking appropriate legal and/or disciplinary action against perpetrators of fraud, bribery and corruption.
- Taking disciplinary action against supervisors where supervisory failures have contributed to the commission of the offence.

**Managers** are responsible for:

- Identifying the risks to which systems and procedures are exposed.
- Developing and maintaining effective controls to prevent and detect fraud, bribery and corruption.
- Ensuring that controls are being complied with.

**Employees** are responsible for:

- Acting with propriety in the use of official resources and in the handling and use of corporate funds whether they are involved with cash or payments systems, receipts or dealing with contractors or suppliers.
- Reporting details immediately to (their line manager or next most senior manager) if they suspect that an offence has been committed or see any suspicious acts or events.

**Fraud, Bribery and Corruption Investigation**

- Where reasonable suspicion that an offence against the Company has taken place, the will investigate the matter thoroughly using recognised and legitimate investigative techniques.
- All investigation will be carried out objectively and confidentially and independently of the line management for the area in which the offence has occurred or is suspected.
- Where members of staff are involved in an offence against the Company, whether actual or attempted, they will be subject to the Company's disciplinary procedures, which may result in dismissal from the Company.
- The Company will seek to prosecute anyone who commits fraud, bribery or corruption and will seek to recover its assets through legal means.
- Lessons learnt will be shared across the Company as soon as possible after an investigation is concluded.

Gavin Jones Ltd are committed to the prevention of fraud, bribery and corruption and to carry out business activities fairly, honestly and openly.

SIGNED:

A handwritten signature in blue ink, appearing to read 'Peter Fane', with a small dot below the signature.

NAME: Mr Peter Fane

POSITION: Executive Chairman

DATE: 27<sup>th</sup> September, 2022