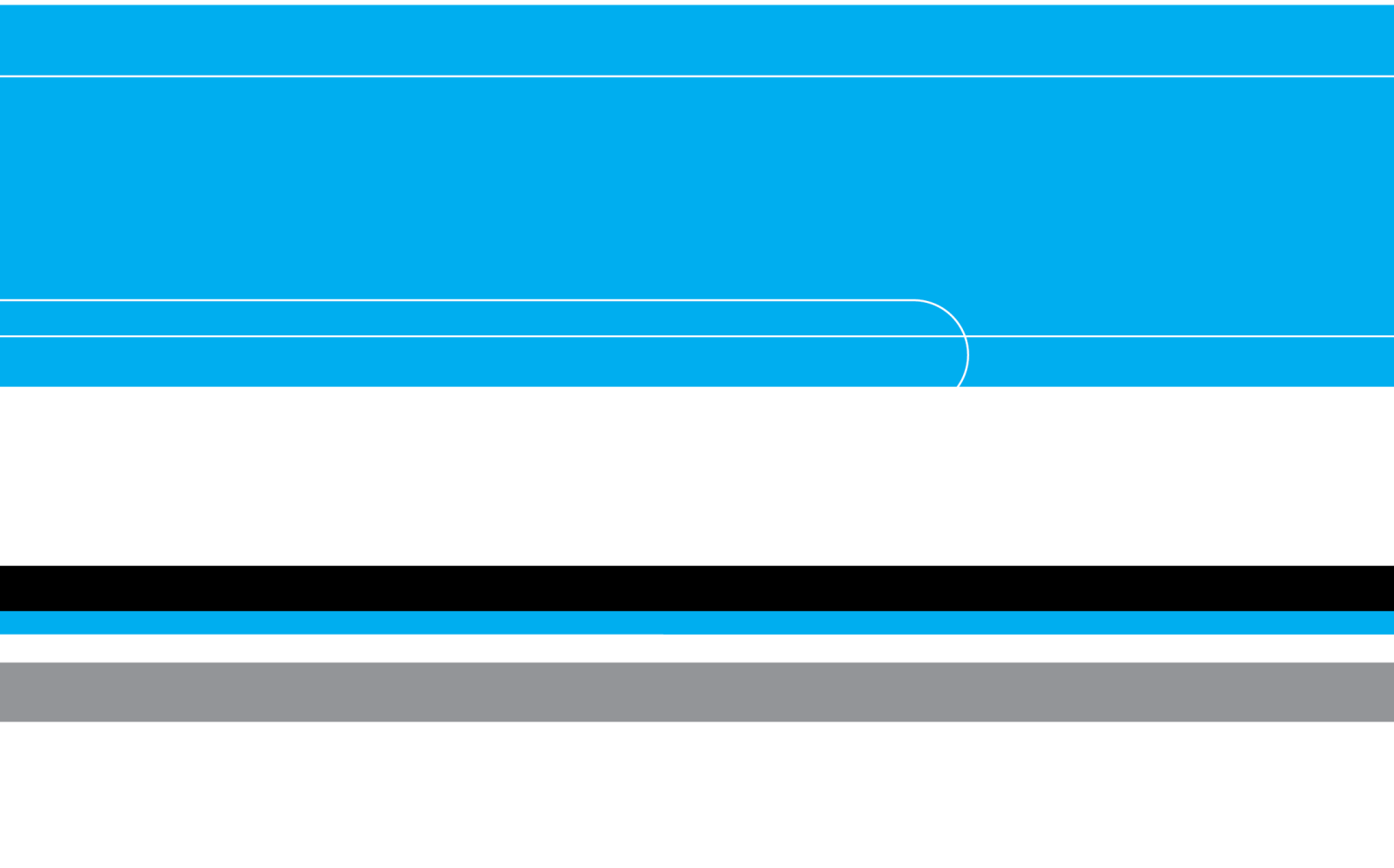


# Fraud Policy

September 2020

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**VolkerWessels UK Fraud Policy**

Issue 3, September 2020

**1. PURPOSE**

The purpose of this policy is to define VolkerWessels UK's stance on fraud and the responsibilities for its prevention and detection.

**2. SCOPE**

The *VolkerWessels UK Fraud Policy* including the Fraud Prevention Plan covers all of the VolkerWessels UK group of companies and affiliate companies and joint ventures.

**3. POLICY****3.1 Policy Statement**

VolkerWessels UK is committed to ethical business behaviour in all that it does. VolkerWessels UK will not tolerate any form of dishonest or illegal activity under any circumstance and undertakes to investigate all cases of suspected fraud and other irregularities and to take appropriate steps following investigations that may include disciplinary action and reporting of fraud to the relevant authorities such that prosecution may take place where appropriate.

The VolkerWessels UK CEO, Business Unit Managing Directors and Line Management of each business unit have responsibility to ensure that the policies are implemented and applied within their businesses.

All matters of suspected fraud must immediately be reported to the Legal Director who has an independent Compliance Officer role for VolkerWessels UK businesses. The Legal Director oversees all matters of integrity reporting and investigation.

There are also independent owners for key areas of fraud prevention and monitoring who report to the VW UK Compliance Officer on fraud related matters:

- Group Procurement Director - supply chain fraud risk
- Group Financial Controller - financial fraud risk
- HR Director - employee fraud risk
- Chief Technology Officer - technology fraud risk
- Tax manager - tax fraud risk

**3.2 Related Policies**

VolkerWessels UK has set out its expectations for employees, contractors and suppliers as set out in the following documents:

- *VolkerWessels UK Integrity Policy*
- *VolkerWessels UK Whistleblowing Policy*
- *VolkerWessels UK Anti-bribery and Corruption Policy*
- *VolkerWessels UK Employee Handbook*
- *VolkerWessels UK Site Scrap Material Policy*
- Responsible Procurement Charter

**3.3 Training**

All staff under-take anti-bribery and corruption training and also confirm their adherence to the policies through induction. All suppliers are required to adhere to the Responsible Procurement Charter.

**3.4 Fraud Risk Register**

A fraud risk register is held as part of the overall risk management process. This identifies key risks, owners, mitigating actions and further actions being taken.

Approved for IMS:	IMS Manager	Document owner:	Director - Legal	Workspace file:	n/a	Page 2 of 4
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**VolkerWessels UK Fraud Policy**

Issue 3, September 2020

**3 POLICY (CONTINUED)****3.5 Fraud Response Plan****Minimising Incidences of Fraud**

The first strand of the VolkerWessels UK Fraud Response Plan is to put in place effective controls to minimise the incidence of fraud such that fraud is kept to an absolute minimum within the VolkerWessels UK group. These controls are set out as actions in the Fraud Risk Register and focus on the following key areas:

- Ensure that all our staff and supply chain are fully conversant with our ethics requirements, understand our zero-tolerance policy and follow our employee handbook, guide-lines and policies for integrity and anti-bribery.
- Ensure that adequate financial controls and segregation of duties are in place in order to minimise the risk of exposure to financial fraud.
- Ensure that a robust supplier on-boarding process including audits and checks on the suitability of suppliers is in place.
- Ensure that adequate employment controls are in place to minimise the risk of exposure to employee related fraud such as identity theft or immigration issues.
- Ensuring that adequate IT security is in place to prevent and mitigate against internet and other IT based fraud.
- Conducting appropriate lessons learnt exercises throughout any fraud investigation and adapting internal controls if appropriate such that a similar fraud would be less likely to occur in the future.

**Reporting a Fraud**

On identifying a suspected fraud, the VW UK Compliance Officer should be immediately notified. The VW UK Compliance Officer role is undertaken by the Legal Director VolkerWessels UK.

A whistleblowing hotline also exists which can be accessed directly by any member of staff or third party. This hotline is publicised on noticeboards on site as well as through the ICT systems.

Contact details are as follows:

- Whistleblowing hotline: 01992 305 348
- VW UK Compliance Officer: [Jenny.Scott-russell@volkerwessels.co.uk](mailto:Jenny.Scott-russell@volkerwessels.co.uk)

**Investigation Log**

All suspected frauds are held on a log by the VW UK Compliance Officer

**Fraud Investigation**

On receiving notification, the VW UK Compliance Officer will ensure the appropriate investigation into a fraud is carried out. The objective of the investigation is to establish whether or not a fraud has taken place, to establish the full extent of the fraud and to identify all the parties to the fraud, in so far as possible, and conclude with appropriate actions.

The investigation may include (but is not limited to):

- Setting up an internal independent investigation team with appropriate expertise;
- Computer based searches and investigations;
- Bringing in an independent fraud investigator;
- Reporting the fraud to relevant counterparty (client or supplier) Compliance Officers and supporting their enquiries; and
- Reporting the fraud to Action Fraud and supporting the police and other government bodies, with their enquiries.

Approved for IMS:	IMS Manager	Document owner:	Legal Director	Workspace file:	n/a	Page 3 of 4
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**VolkerWessels UK Fraud Policy**

Issue 3, September 2020

**3 POLICY (CONTINUED)****3.5 Fraud Response Plan (Continued)****Fraud Investigation (Continued)**

When the investigation has been undertaken, the outcome of the investigation is recorded and appropriate action is taken. This may include (but is not limited to):

- Disciplinary procedure being undertaken;
- Notification to clients or supply chain;
- Ceasing to trade with inappropriate counter-parties;
- Notification to relevant bodies or authorities;
- Pursue legal action; and
- Provide evidence and support for any criminal action.

At all times, care should be taken to ensure that any evidence is secured in a legally admissible form and the VW UK Compliance Officer may call upon external legal counsel advice at any time in order to fulfil this requirement.

**Prevention of Losses**

Immediately on receiving notification of a fraud, the VW UK Compliance Officer will also ensure that timely and effective action is taken to prevent any further losses and to maximise the recovery of the loss. The nature of this activity will depend on the type of fraud committed and may include (but is not limited to):

- Where appropriate, suspension of individuals prior to investigation taking place;
- Notification of bankers and procuring a court injunction to freeze bank accounts;
- Mandating additional controls to ensure that the fraud is not duplicated elsewhere;
- Notifying appropriate senior management to ensure additional procedures / management steps are taken (e.g. to increase surveillance at a site susceptible to theft); and
- Removing access to systems and sites where appropriate.

**Lessons Learnt**

Following the investigation, a lessons learnt review should be undertaken to ensure that any lessons learnt are captured and appropriate additional controls put in place as identified. Where lessons learnt can be of value to other organisations the VW UK Compliance Officer would agree with that organisation on their preferred method of dissemination of this information.

**Protection for Individuals**

The VW UK Compliance Officer has overall responsibility to ensure that individuals are protected as appropriate throughout the procedure and will be supported in this by the VW UK Group HR Director as appropriate. The *VolkerWessels UK Whistleblowing Policy* sets out the arrangements in place to protect informants from reprisals and HR policies are in place to ensure adequate arrangements are in place to protect individuals from malicious or unfounded allegations.

**4. IMS AUTHORISATION****Document owner approval:**

**Jenny Scott-Russell**, Legal Director - 09.09.2020

**Approval for IMS:**

**Andria Georgiou**, IMS Coordinator - 11.09.2020

Approved for IMS:	IMS Manager	Document owner:	Legal Director	Workspace file:	n/a	Page 4 of 4
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