

Bribery, Fraud and Malpractice

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Document Control Sheet and Version History

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1.0	Name: Ben Sandover Role: Financial Controller Date: 14/01/2025	Name: Peter Rogers Role: Infrastructure Director Date: 14/01/2025

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1. Policy Statement

D2 Global understand the prevalence of bribery, fraud and malpractice in the commercial environment and the negative impact it could have on the company, its employees, and clients.

We do not condone and will not tolerate fraud or malpractice in any way, shape, or form.

D2 Global requires all staff at all times to act honestly and with integrity and to safeguard the resources for which they are responsible. Fraud 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 responsibilities with regard to the prevention of fraud.

The Bribery Act 2010 describes those actions as: theft, deception, bribery, forgery, corruption, false accounting, and conspiracy to commit these offences. For practical purposes fraud may be defined as the use of deception with the intention of obtaining an advantage, avoiding an obligation, or causing loss to another party.

2. Commitment

D2 Global will strive to:

- Develop and maintain effective controls to prevent fraud.
- Carry out vigorous and prompt investigations if fraud occurs.
- Take appropriate legal and/or disciplinary action against perpetrators of fraud.
- Take disciplinary action against supervisors where supervisory failures have contributed to the commission of the fraud.
- Ensure training on this policy is provided for all workers and our zero-tolerance approach to bribery and corruption will, where appropriate, be communicated to clients, suppliers, contractors and business partners

All staff will be responsible for:

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

Individual members of staff 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 the CEO or Managing Directors if they suspect that a fraud has been committed or see any suspicious acts or events.

Any instances of suspected bribery, fraud or malpractice reported may be made with full anonymity and in the strictest of confidence. Any reports will be recorded, investigated and if necessary, acted upon in line with the company's misconduct procedure and UK law.

3. Review of Policy & Procedures

This policy along with corresponding procedures will be reviewed at regularly intervals for its effectiveness and compliance will be monitored through regular audits of the company's activities.