

1. It is Blu-3 (UK) Ltd policy to conduct all of its affairs in an honest and ethical manner.
2. Blu-3 (UK) Ltd takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all business dealings and relationships wherever Blu-3 (UK) Ltd operates.
3. Blu-3 (UK) Ltd will not tolerate fraud, corruption or abuse of position for personal gain and shall implement and enforce effective systems to counter bribery and corruption.
4. The purpose of this Policy Statement is to set clear principles for countering fraud and corruption.
5. The Policy Statement includes: -
 - The scope.
 - The culture and stance against fraud and corruption.
 - How to raise concerns and report financial malpractice.
 - The principle of having an anti-fraud and corruption strategy.
 - Responsibilities.
6. The relevant definitions are as follows:
 - Fraud is the “intentional distortion of financial statements or other records by persons, internal or external to the organisation, which is carried out to conceal the misappropriation of assets or otherwise for gain”
 - Corruption is the “offering, giving, soliciting or acceptance of an inducement or reward which may improperly influence the action of any person”.

Scope

7. The Policy Statement applies to all employees, full time, part time, temporary or casual, who work for Blu-3 (UK) Ltd.
8. The company expects that individuals and organisations that it deals with (suppliers, contractors, service providers etc.), will act with integrity and without thought or actions involving fraud and corruption. Evidence of such acts are most likely to lead to termination of contract and may lead to prosecution.

Culture and Stance against Fraud and Corruption

9. Responsibility for an anti-fraud culture is the joint duty of all those involved in giving direction, determining policy and management. The strategy should be directed against fraud and corruption whether it is attempted against Blu-3 (UK) Ltd externally or from within.
10. Blu-3 (UK) Ltd expects that employees at all levels will lead by example in ensuring adherence to legal requirements, contract procedure, financial procedure, codes of conduct and best (professional) practice.

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11. As part of this culture, the company will provide clear guidelines by which concerns can be raised by all employees.
12. Senior Management is expected to deal with those who defraud Blu-3 (UK) Ltd or those who are corrupt. The company, including Senior Management and Directors, has a zero tolerance approach and will deal with financial malpractice swiftly and firmly.

Raising Concerns

13. Although this document specifically refers to fraud and corruption, it equally applies to any forms of malpractice that can reduce confidence in Blu-3 (UK) Ltd and its services, and may also include acts committed outside of official duties but which impact upon the companies trust in the individual concerned. Examples may include the criminal acts of theft of property, which includes all assets and cash, false accounting, obtaining by deception, pecuniary advantage by deception, computer abuse or computer crime. It also includes bribery and corruption. All employees can be exposed to a number of pressures, from outside influences, to act in a particular way in a particular case: this may involve favouritism regarding the access to all kinds of services and benefits.
14. The employees of Blu-3 (UK) Ltd are an important element in the company stance on fraud and corruption and they are positively encouraged and expected to raise any concerns that they may have on these issues where they are associated with the company activities.
15. Employees should normally raise concerns with their immediate manager, however, it is recognised that they may feel inhibited in certain circumstances. In this case, employees should contact either the Managing Director or client manager.
16. Concerns will be treated in confidence, properly investigated and dealt with fairly. There is a need to ensure that any investigation process is not misused, therefore, any internal abuse, such as raising malicious or vexatious allegations, may be dealt with as a disciplinary matter.

Responsibility

17. The Commercial Director is responsible for ensuring that the company has control systems and measures in place “to enable the prevention and detection of inaccuracies and fraud, and the ability to reconstitute any lost records”. An Anti-fraud and Corruption policy statements and strategy helps towards discharging part of this responsibility.

This policy will be reviewed annually.

a. Print Name: **Gerry Curran**

Job Title: **Operations Director (Acting MD)**

b. *Signature of above named person in box:*

c. Date Reviewed 01st May 2017


 (As dated above)

d. Confirmed as per the **HSEQ Directors Initials** in the box to the right of this text.

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