

Introduction

Coinford is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This Economic Crime policy outlines Coinford's position on preventing and prohibiting bribery, tax evasion, fraud and theft, as well as any other associated financial crime as recognised in UK legislation.

The Company will not tolerate any form of Economic Crime by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior Management and the Board of Directors is committed to implementing effective measures to prevent, monitor and eliminate Economic Crime.

Scope of this policy

This policy applies to all employees and officers of Coinford, and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, Coinford ("associated persons") within the UK and overseas. Every employee and associated person acting for, or on behalf of Coinford is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the Company.

Coinford may also face criminal liability for unlawful actions taken by its employees or associated persons under the following acts:

- Criminal Finance 2017;
- Bribery Act 2010;
- Fraud Act 2006;
- Forgery and Counterfeiting Act 1981; and
- Theft Act 1968;
- Economic Crime and Corporate Transparency Act 2023 (ECT Act 2023)

All employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time by the organisation.

This policy covers:

- Anti-Tax Evasion and the main areas of liability under the Criminal Finance Act 2017
- Anti-Fraud and the main areas of liability under the Criminal Finance Act 2017
- Anti-Bribery and Corruption and the main areas of liability under the Bribery Act 2010;
- the responsibilities of employees and associated persons acting for, or on behalf of, the organisation; and
- the consequences of any breaches of this policy.
- Details on how to report any cases of non-compliance of this policy to the Company

Criminal Finances (Anti-Tax Evasion)**Criminal Finances Act 2017**

This section outlines the Coinford's position on preventing and prohibiting tax evasion, in accordance with the Criminal Finances Act 2017.

Coinford has a zero-tolerance approach to all forms of tax evasion, whether under UK law or under the law of any foreign country. This applies to all employees, agents or consultants or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate tax evasion in any form.

Employees and Associates of the Company must not undertake any transactions which:

- cause the Company to commit a tax evasion offence; or
- facilitate a tax evasion offence by a third party who is not an associate of the Company.

We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter tax evasion facilitation.

At all times, business should be conducted in a manner such that the opportunity for, and incidence of, tax evasion is prevented.

For the purposes of this policy:

“Associates” includes company contractors or an agent of the Company (other than a contractor) who is acting in the capacity of an agent, or any person who performs services for and on behalf of the Company who is acting in the capacity of a person or business performing such services.

“Tax Evasion” means an offence of cheating the public revenue or fraudulently evading UK tax, and is a criminal offence. The offence requires an element of fraud, which means there must be deliberate action, or omission with dishonest intent.

“Foreign Tax Evasion” means evading tax in a foreign country, provided that the conduct is an offence in that country and would be a criminal offence if committed in the UK. As with tax evasion, the element of fraud means there must be deliberate action, or omission with dishonest intent.

“Tax Evasion Facilitation” means being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person, or aiding, abetting, counselling or procuring the commission of that offence. Tax evasion facilitation is a criminal offence, where it is done deliberately and dishonestly.

Tax evasion is not the same as tax avoidance or tax planning. Tax evasion involves deliberate and dishonest conduct. Tax avoidance is not illegal and involves taking steps, within the law, to minimise tax payable (or maximise tax reliefs).

“Tax” means all forms of UK taxation, including but not limited to corporation tax, income tax, value added tax, stamp duty, stamp duty land tax, national insurance contributions (and their equivalents in any non-UK jurisdiction) and includes duty and any other form of taxation (however described).

Responsibilities

The Board of Directors of the Company has overall responsibility for ensuring that this policy complies with our legal obligations, and our employees and associates comply with it. This policy is adopted by the Company. It may be varied or withdrawn at any time, in the Company's absolute discretion. Employees in leadership positions are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it.

Coinford has completed a risk assessment and has established procedures governing certain transactions with third parties designed to prevent specific areas of possible tax evasion by a third party. Specific guidance can be sought from the HR Department.

The Company is responsible for offering employees appropriate training to understand tax evasion, and actions to take to prevent tax evasion.

Employees and Associates must ensure that they read, understand and comply with this policy.

It is not acceptable for team members and Associates to:

- Engage in any form of facilitating Tax Evasion or Foreign Tax Evasion
- Aid, abet, counsel or procure the commission of a Tax Evasion offence or Foreign Tax Evasion offence by another person;
- Fail to promptly report any request or demand from any third party to facilitate the fraudulent Evasion of Tax by another person, in accordance with this policy; or
- Engage in any other activity that might lead to a breach of this policy; or
- Threaten or retaliate against another individual who has refused to commit a Tax Evasion offence or a Foreign Tax Evasion offence or who has raised concerns under this policy

It is an offence under the law of any part of the UK to be knowingly concerned in, or taking steps with a view to, fraudulently evade tax.

Prevention

There is not an exhaustive list of Tax Evasion opportunities. At a more general level, the best defence against Tax Evasion and facilitation of Tax Evasion remains the vigilance of our employees and Associates and the adoption of a common-sense approach supported by our clear whistleblowing procedure. In applying common sense, team members must be aware of the following:

- Is there anything unusual about the way an Associate of the Company is conducting their relationship with the Company or the third party (usually a customer)?
- Is there anything unusual about the customer's or Associate's conduct or behaviour in your dealings with them?
- Are there unusual payment methods?

Unusual payment methods and unusual conduct of third parties with Company Associates can be indicative that a transaction may not be as it seems.

Anti-Bribery and Corruption

Bribery Act 2010

This section outlines the Coinford's position on complying with the Bribery Act 2010 in its business activities in the UK and overseas.

Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the:

- intention of inducing or rewarding improper performance of a function or activity; or
- knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any activity performed during a person's employment, or on behalf of another organisation or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed under the Bribery Act 2010 if:

- an employee or associated person acting for, or on behalf of, Coinford offers, promises, gives, requests, receives or agrees to receive bribes; or
- an employee or associated person acting for, or on behalf of, Coinford offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of their duties (where local law does not permit or require such influence); and
- the Company does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

All employees and associated persons are required to comply with this policy, in accordance with the Bribery Act 2010.

What is prohibited?

Coinford prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or organisation, whether a public or government official, official of a state-controlled industry, political party or a private person or organisation, regardless of whether the employee or associated person is situated in the UK or overseas. The bribe might be made to ensure that a person or organisation improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual or regulatory advantage for the Company in either obtaining or maintaining organisation business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors, advisors, customers, suppliers or other third parties.

Records

Employees and, where applicable, associated persons, are required to take care to ensure that all organisation records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials.

Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative.

Employees and associated persons are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.

Working Overseas

Employees and associated persons conducting business on behalf of the organisation outside the UK may be at greater risk of being exposed to bribery or unethical business conduct than UK-based employees. Employees and associated persons owe a duty to the organisation to be extra vigilant when conducting international business.

Employees and associated persons are required to cooperate with Coinford's risk management procedures and to report suspicions of bribery to their line manager. While any suspicious circumstances should be reported, employees and associated persons are required particularly to report:

- close family, personal or business ties that a prospective agent, representative or joint-venture partner may have with government or corporate officials, directors or employees;
- a history of corruption in the country in which the business is being undertaken;
- requests for cash payments;
- requests for unusual payment arrangements, for example via a third party;
- requests for reimbursements of unsubstantiated or unusual expenses; or
- a lack of standard invoices and proper financial practices.

If an employee or associated person is in any doubt as to whether a potential act constitutes bribery, the matter should be referred to their line manager.

Corporate entertainment, gifts, hospitality and promotional expenditure***Principle***

The organisation permits corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken:

- for the purpose of establishing or maintaining good business relationships;
- to improve the image and reputation of the organisation; or
- to present Coinford's services effectively;

provided that it is:

- arranged in good faith; and

- not offered, promised or accepted to secure an advantage for the Company or any of its employees or associated persons or to influence the impartiality of the recipient.

Coinford will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure.

This principle applies to employees and associated persons, whether based in the UK or overseas.

Procedure

Employees and, where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to their line manager.

Employees are required to set out in writing:

- the objective of the proposed client entertainment or expenditure;
- the identity of those who will be attending;
- the organisation that they represent; and
- details and rationale of the proposed activity.

Coinford will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. Coinford will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence or a particular business benefit was being sought (for example prior to a tendering exercise).

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers or other business contacts should be reported immediately to their line manager. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example where there could be a real or perceived conflict of interest. Generally, small tokens of appreciation, such as flowers or a bottle of wine, may be retained by employees.

If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior written approval from their line manager is required, together with details of the intended recipients, reasons for the gift and business objective. These will be authorised only in limited circumstances.

Employees and, where applicable, associated persons must supply records and receipts, in accordance with the organisation's expenses policy.

Charitable and political donations

Coinford considers that charitable giving can form part of its wider commitment and responsibility to the community. The organisation supports several charities, that are selected in accordance with objective criteria, following a risk assessment. For example, Coinford supports The Lighthouse Club, which helps with financial and emotional support to those in the construction industry. The organisation may also support fundraising events involving employees.

What practices are permitted?**This policy does not prohibit:**

- normal and appropriate hospitality and entertainment with clients (please see the organisation's expenses policy); and
- the use of any recognised fast-track process that is publicly available on payment of a fee.
- Any such practices must be proportionate, reasonable and made in good faith. Clear records must be kept.

Fraud

Fraud is a broad term for acts of financial misconduct but can be defined as 'any dishonest wrongdoing with the intent to gain or to cause loss to another'. Whilst offences that constitute fraud have, since 15th January 2007, come under The Fraud Act 2006, such an offence may equally be prosecuted under The Theft Act 1968 or 1978 if such acts were committed before 15th January 2007 where the element of the offence was one of deception.

As defined by The Fraud Act 2006, fraud can be committed in the following ways:

- Fraud by false representation
- Fraud by failing to disclose information
- Fraud by abuse of position
- Possession of articles for use in fraud
- Making or supplying articles for use in fraud
- Participation by sole trader in fraudulent business
- Obtaining services dishonestly

False Accounting

False Accounting is defined as 'dishonestly destroying, defacing, concealing or falsifying any account, record or document, required for any accounting purpose, with a view to personal gain or gain of another, or with the intent to cause loss to another or furnishing information which is or may be misleading, false or deceptive' (Theft Act 1968).

Theft

Theft is defined as 'dishonestly appropriating property belonging to another with the intention of permanently depriving the other of it' (Theft Act 1968). This may include the misuse of funds, assets or cash.

The above categories are designed to summarise the acts of fraud however, this policy is equally applied to similar elements of financial impropriety or wrongdoing, which may constitute offences under:

- The Identity Cards Act 2006 and Identity Documents Act 2010
- The Proceeds of Crime Act 2002
- The Forgery and Counterfeiting Act 1981

Coinford operates a zero-tolerance approach to any act of fraud, false accounting or theft. In most cases, acts of misconduct relating to Fraud will be treated as gross misconduct and will be dealt with using the Company's Disciplinary Policy.

As with other areas of the policy, Coinford relies on its employees to report any act of fraud in the organisation.

Risk Management

Coinford has established detailed risk management procedures to prevent, detect and prohibit economic crime. The organisation will conduct risk assessments for each of its key business activities on a regular basis and, where relevant, will identify employees or officers of the organisation who are in positions where they may be exposed to economic crime.

Coinford will identify high-risk areas, for example projects undertaken in high-risk countries, tenders for work and those working on high-value projects.

Coinford will:

- regularly monitor "at risk" employees and associated persons;
- regularly communicate with "at risk" employees and associated persons;
- undertake extensive due diligence of third parties and associated persons; and
- communicate its zero-tolerance approach to economic crime to third parties, including actual and prospective customers, suppliers and joint-venture partners.

Reporting Suspected Non-Compliance of Economic Crime Policy

Coinford depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees and associated persons are requested to assist the organisation and to remain vigilant in preventing, detecting and reporting Economic Crime.

Employees and associated persons are encouraged to report any concerns that they may have to their line manager as soon as possible. Issues that should be reported include:

- any suspected or actual attempts at bribery, tax evasion, fraud;
- concerns that other employees or associated persons may be being bribed, are evading tax, have been involved in tax evasion, or have committed a fraudulent act; or
- concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.
- concerns that other employees or associated persons may be assisting in tax evasion.
- Concerns that other employees or associated persons may be assisting in fraudulent activity

A form is available from the HR department to allow employees to record any incidents of suspected non-compliance. Any such reports will be thoroughly and promptly investigated by the Finance Director in the strictest confidence. Employees and associated persons will be required to assist in any investigation into possible or suspected non-compliance.

Employees will also be required to comply with the organisation's whistleblowing policy.

Employees or associated persons who report instances of non-compliance in good faith, will be supported by the Company. Coinford will ensure that the individual is not subjected to detrimental treatment because of their report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees and associated persons should not agree to remain silent. They should report the matter to the Finance Director.

When an individual reports instances of non-compliance, the organisation will process any personal data collected in accordance with its data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the report of non-compliance.

Action by the organisation

Coinford will fully investigate any instances of alleged or suspected non-compliance. Employees suspected of bribery, tax evasion or fraud may be suspended from their duties while the investigation is being carried out. Coinford will invoke its disciplinary procedures where any employee is suspected of non-compliance of this policy, and proven allegations may result in a finding of gross misconduct and immediate dismissal. Coinford may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, Coinford who are found to have breached this policy.

Coinford may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police. The organisation will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

Review of procedures and training

Coinford will regularly communicate its Economic Crime measures to employees and associated persons. The Company will set up training sessions where applicable.

The Company will monitor and review the implementation of this policy and related procedures on a regular basis, including reviews of internal financial systems, expenses, corporate hospitality, gifts and entertainment policies.

Employees and those working for, or on behalf of, the organisation are encouraged to contact their line manager with any suggestions, comments or feedback that they may have on how these procedures may be improved.

Coinford reserves the right to amend and update this policy as required. For the avoidance of doubt, this policy does not form part of employees' contracts of employment.

Associated Policies

[Whistleblowing Policy](#)
[Disciplinary Policy](#)

Signed by

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke.

Managing Director

07-Mar-2024