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Fraud policy

Revision schedule

Revision no.	Date	Details of change
Rev 1	June 2020	First Issue for new Infrastructure management system platform
Rev 2	June 2021	Minor changes to update business terminology following annual policy review
Rev 3	June 2022	Annual policy review – no content changes required
Rev 4	June 2023	Annual policy review – minor administrative changes

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Morgan Sindall Construction is committed to high legal, ethical, and moral standards and expects all employees, as well as suppliers, subcontractors, and customers (within their own policies) to share this commitment.

Accordingly, Morgan Sindall Construction is committed to the elimination of any fraud by:

- Ensuring that the business has a strong control environment and that everyone is responsible for eliminating fraud risk;
- Promoting a zero-tolerance approach to fraud;
- Encouraging anyone having a reasonably held suspicion of fraud to report it, guaranteeing no employee will suffer as a result of doing so;
- Ensuring all fraud investigations are carried out in accordance with the Fraud Response plan;
- Ensuring all fraud investigations are carried out under the leadership of senior management;
- Fully investigating all suspicions of dishonest behaviour, ensuring that when appropriate corporate internal disciplinary procedures as well as civil and / or criminal legal action will be taken;
- Promoting awareness of fraud risks and requiring management to implement a sound system of preventative and detective controls to manage these risks;
- Investing in the education of managers and employees so they are aware of the fraud risks faced by the business.

Morgan Sindall Construction has put into place a Fraud Response Plan to underpin this commitment, which outlines the procedures to be taken by our employees should fraud be detected or suspected in any of our activities. This plan is company specific and is reviewed and updated in line with this policy's review schedule.

Employees having a concern about fraud or other dishonesty, malpractice etc matter should raise the issue with their line manager, Head of Internal Audit, Director of Legal Services or Morgan Sindall Group General Counsel.

If employees continue to have concerns and / or feel that they are unable to raise an issue in this way, they should raise the matter using the Group's Raising Concerns helpline.

The helpline is available 24 hours a day, 7 days a week. The freephone number is 0800 915 1571 and all calls are taken by Safecall, an independent organisation with impartial staff trained to handle these types of calls. Alternatively, submit a report online at www.safecall.co.uk/report.

This policy supports and compliments the Morgan Sindall Construction policies for Ethics in the Workplace, Competition Law Compliance, and Bribery Prevention.

Signed



Pat Boyle
Managing Director – Construction

June 2023