



IVOR KING CIVIL ENGINEERING CONTRACTORS LTD

ANTI-COMPETITIVENESS, FRAUD, BRIBERY & CORRUPTION POLICY

1. Policy

1.1. This policy relates to the activities of Ivor King Civil Engineering Contractors Ltd, its employees, over which it can reasonably be expected to have control.

1.2. This Anti-competitiveness Fraud, Bribery and Corruption Policy sets out the standards that must be met in order to ensure individuals comply with the Competition law, Anti-Bribery Act 2010 and Fraud Act 2006. It sets out the standards that must be met.

1.3. This policy relates to fraud, bribery, corruption and competition. References to fraud refer also to acts of bribery and corruption.

1.4. Complaints unrelated to fraud, bribery or corruption should be submitted using the Complaints Policy HR52.

1.5. This policy will be kept under review with the maximum review time of 12 months.

2. Definitions

2.1. The term fraud is commonly used to describe the use of deception to deprive, disadvantage or cause loss to another person or party; or secure unwarranted personal gain. An example of fraud would be to submit false qualifications or other achievements with a scholarship application, or for a scholar on award not to inform the CSC of travel plans which may affect their stipend payments, or for a scholar to fail to repay advances of stipend or payments an individual is not otherwise entitled to.

2.2. The term bribery is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage. An example of bribery would be for a candidate to offer money to a nominating agency in order to be nominated for a scholarship, or for a scholar to offer a gift to a CSC staff member in order to have their award extended.

2.3. The term corruption is broadly defined as the abuse of entrusted power for personal gain. An example of corruption would be for an employee of a nominating agency to offer to nominate a candidate in return for a gift, or for an employee of Ivor King Civil Engineering Contractors Ltd to withhold payments to scholars for personal gain.

2.4. The term anti-competition is defined as Cartels, where two more businesses agree (whether in writing or otherwise) not to compete with each other. Cartels include agreements to but not limited to:

- fix prices
- engage in bid rigging (for example, cover pricing)
- limit production
- share customers or markets.
- Gentlemen's agreements

3. Principles

3.1. Ivor King Civil Engineering Contractors Ltd is committed to the prevention of anti-competitiveness, fraud, bribery and corruption and the promotion of an anti-fraud culture.

3.2. Ivor King Civil Engineering Contractors Ltd operates a zero-tolerance attitude to anti-competitiveness, fraud, bribery and corruption and requires members of its staff, to act honestly and with integrity at all times, and to report all reasonable suspicions of anti-competitiveness, fraud, bribery, corruption and actions contrary to competition law.

4.1. Ivor King Civil Engineering Contractors Ltd has appointed HR as Counter Fraud Champions and Group Managing Director with responsibility to ensure that robust practices are in place around anti-competitiveness, Fraud, Bribery and Corruption.

4.2. Ivor King Civil Engineering Contractors Ltd has undertaken a n anti-competitiveness, fraud, bribery and corruption risk assessment DC0195

Ivor King Civil Engineering Contractors Ltd is committed to compliance with competition law, fraud, bribery, corruption requirements, to this ends it uses the four-step risk assessment process;

Step 1 – Risk identification

Step 2 – Risk assessment

Step 3 – Risk mitigation

Step 4 – Review

Ivor King maintains a legal compliance register using “Cedric” software to drive its review process.

4.3. Ivor King Civil Engineering Contractors Ltd has a policy and response plan in place for dealing with potential instances of anti-competitiveness, fraud, bribery and corruption (the procedure within this document)

4.4. Ivor King Civil Engineering Contractors Ltd has well established and documented reporting routes for staff, contractors and members of the public to report suspicions of anti-competitiveness, fraud, bribery and corruption and a mechanism for recording these referrals and allegations.

4.5. Ivor King Civil Engineering Contractors Ltd all staff are aware of this policy their role and requirements via induction.

4.6. Ivor King Civil Engineering Contractors Ltd has mechanisms in place to report identified loss from fraud, bribery, corruption and error, and associated recoveries

4.7. Ivor King Civil Engineering Contractors Ltd, will investigate all instances of actual, attempted and suspected fraud committed by individuals and will where appropriately seek to recover funds lost through anti-competitiveness, fraud, bribery or corruption.

5. Reporting Suspicions

5.1. Where a suspicion is identified the suspicion should be raised. All concerns raised will be managed under and in compliance with the processes of the Whistle Blowing Policy HR47.

5.2. Where the suspicion is about Ivor King Civil Engineering Contractors Ltd but it would not be appropriate to address the suspicion with the employee directly, or an unsatisfactory response has been given when the suspicions were raised directly, the suspicions, with all necessary evidence should be presented in writing to the CEO of Ivor King, either by email or by letter. The CEO will take all reasonable steps to ensure that confidentiality is maintained in such cases, and that those making allegations are not disadvantaged in any way by doing so. Ivor King Civil Engineering Contractors Ltd upholds this through the Whistleblowing Policy and Procedure.



Mark Brewer
Group Managing Director
09/05/2024

Change Tracker			
Date	Reason	Change	Who
25/11/2022	Review	Updated	RH
28/11/2023	Review	Updated	RH
11/01/2024	Updated	Change in Signature	RH/MB
27/03/2024	Updated	to include fraud & corruption	DJS
09/05/2024	Updated	to include anti competitiveness	DJS