

## **Fraud Policy Statement**

09.12.2025

Manning Construction Ltd 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 your responsibilities with regard to the prevention of fraud. Fraud is defined as a criminal deception committed by a person who acts in a false and deceitful way. There are a string of offences under a variety of legislation and essentially the suspect will demonstrate some form of dishonesty and/or deception. The Fraud Act 2006 became law in January 2007. The Act establishes a new general offence of fraud, which can be committed in three ways – by false representation, by failing to disclose information and by abuse of position.

To meet our goals we have set the following responsibilities:

**Manning Construction Ltd is responsible for:**

1. Developing and maintaining effective controls to prevent fraud.
2. Carrying out vigorous and prompt investigations if fraud occurs.
3. Taking appropriate legal and/or disciplinary action against perpetrators of fraud.
4. Taking disciplinary action against supervisors where supervisory failures have contributed to the commission of the fraud.

**Managers are responsible for:**

1. Identifying the risks to which systems and procedures are exposed.
2. Maintaining effective controls to prevent and detect fraud.
3. Ensuring that controls are being complied with.

**Employees are responsible for:**

1. 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
2. Reporting details immediately to (their line manager or next most senior manager) if they suspect that a fraud has been committed or see any suspicious acts or events.

Our policy is available to all persons working on behalf of Manning Construction Ltd and will be made available to interested parties upon request. This Fraud Policy Statement is also available on the Manning Construction Ltd website.



**Mr. Stephen Euston**  
Managing Director