12 Fraud & Corruption

Bauer Technologies will not tolerate fraud, corruption, or abuse of position for personal gain, wherever it may be found, in any area of its activities. This policy statement applies to all employees who work for Bauer Technologies in any capacity (full time, part time, temporary or casual, agency and subcontractors). Either Managing Director is the 'Responsible Officer' and, supported by the Senior Management Team, has overall responsibility for the maintenance and operation of this policy.

The responsibility for providing a corporate framework within which counter-fraud arrangements will flourish and for the promotion of an anti-fraud culture across the whole company rests with the Managing Director and Senior Managers. All employees have a key role in successful counter-fraud activities. This should provide a sound defence against the internal and external abuse of Company funds and/or position.

Fraud is defined as "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 defined as "the offering, giving, soliciting or acceptance of an inducement or reward which may improperly influence the action of any person".

The Management of Bauer Technologies expect that the individuals and organisations (e.g., suppliers and contractors) it deals with, will act with integrity and without thought or actions involving either fraud or corruption. Appropriate clauses will be included in our subcontracts regarding the consequences of proven fraud, bribery, or corruption. Evidence of such acts is likely to lead to the termination of subcontracts and may result in prosecution.

We expect that employees at all levels will lead by example in ensuring adherence to legal requirements, contract procedures, financial procedures, codes of conduct and best (professional) conduct.

Raising Concerns

Although this document refers specifically to fraud and corruption, it equally applies to any other act or omission which could reduce confidence in our Company and the way we carry out our business. These acts or omissions may include things which are done 'outside of official duties' but which impact the way the company is perceived or on the relationship of trust between Bauer Technologies and the individual/organisation concerned. Examples include criminal acts such as theft of property, false accounting, obtaining by deception, computer crimes, bribery, and corruption.

All employees may be exposed to pressures from outside influences to act in a particular way in a particular circumstance. For example, 'favouritism' regarding access to services and benefits. Our employees are an important element in our defence against fraud and corruption so they are encouraged to raise any concerns they may have at the earliest practicable time through their immediate Line Manager. In circumstances where the employee feels they cannot raise concerns with their immediate Line Manager they should contact one of the Senior Management Team or a Managing Director.

The business also has in place a whistle blowing policy which applies to fraud and corruption concerns. All concerns raised will be treated in strict confidence, properly investigated and dealt with fairly and appropriately.

Any employee which is offered or receives gifts and or hospitality invites shall log these in accordance with Bauer Technologies procedure.

The Company reserves the right to treat malicious allegations as a disciplinary matter.

This policy is produced in line with the Bribery Act 2010 as amended.

Bauer Technologies maintain a separate Preventing Facilitation of Tax Evasion Policy.

Paul Doyle
Managing Director
20th July 2026

