



## Policy Statement

Insulations & Heating Installations (IHI) are committed to operating a framework for the prevention and detection of bribery, corruption, fraud, and malpractice, and a robust process to be followed if an act of bribery corruption, fraud, or malpractice is suspected.

Our conduct is based on our commitment to acting professionally, fairly and with integrity. IHI does not tolerate any form of bribery, corruption, fraud, or malpractice.

This policy applies to IHI employees (staff, contract and temporary) and extends to all our majority owned business dealings and transactions in all areas in which we operate. We will encourage the application of this policy amongst our business, including contractors and suppliers.

IHI does not engage in bribery, corruption, fraud, malpractice or any unethical inducement or payment including facilitation payments and 'kickbacks.' All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the company. Employees must declare and keep a record of hospitality or gifts accepted or offered, which will be subject to managerial review. We do not make direct/indirect contributions to political parties.

## Commitments

We shall be a Company that:

- ✓ will uphold all UK legislation relevant to countering act of bribery corruption, fraud, or malpractice, including the Bribery Act 2010.
- ✓ requires employees and persons working on our behalf to always act with honesty, integrity, propriety, and due care in all matters, but particularly in the safeguarding of the Company, its associated assets, and its reputation.
- ✓ strictly prohibits and will not tolerate fraud, acts of bribery or any other form of corrupt behaviour.
- ✓ understands and regularly assesses the nature and extent of risks relating to bribery corruption, fraud, or malpractice
- ✓ ensures by appropriate due diligence that those it does business with share the culture of intolerance to bribery corruption, fraud, or malpractice.
- ✓ dedicates sufficient resources to implement and embed procedures and to provide bribery corruption, fraud, or malpractice training
- ✓ ensures that practical, cost-effective controls and procedures are implemented to proactively identify fraud, bribery and corruption or the threat of bribery corruption, fraud, or malpractice.
- ✓ formulates and requires adherence to control processes designed to prevent and detect acts of bribery corruption, fraud, or malpractice.
- ✓ remains alert to the risk of fraud, bribery, and other irregularities both within the organisation and in organisations with which the company contracts and reports any matters of potential concern

- ✓ recognises that signs of fraud, bribery, and corruption in the organisation and/or its supply chain could be an indication of other illegal or unethical activity, such as modern slavery and/or human trafficking promotes an open, honest, and questioning culture which encourages propriety and vigilance amongst all personnel
- ✓ implements a process to enable all personnel to raise any matter of genuine concern (Whistleblowing Policy)
- ✓ takes seriously any breach of this Policy, which may ultimately lead to dismissal via the Company disciplinary procedure, or for non-employees may result in permanent removal from IHI property, and/or be subject to the involvement of the Police and judicial system in the event of any criminal activity

## RESPONSIBILITIES

The Company Directors of IHI will establish appropriate responsibilities and procedures within its operations. If any instance of bribery, corruption, fraud, or malpractice is identified; we will take remedial steps immediately.

## TRAINING AND COMMUNICATIONS

We will communicate this policy and relevant guidance to employees. We will also communicate this policy to our suppliers and contractors. Managers and employees will receive relevant training on how to implement this policy in the scope of their employment with the company.

## RAISING CONCERNNS AND SEEKING GUIDANCE

Employees are encouraged to raise concerns about any instance of bribery corruption, fraud, or malpractice at the earliest possible stage.

Disclosures may be emailed to [whistle@ofgem.gov.uk](mailto:whistle@ofgem.gov.uk)

Alternatively write or call us at:

Whistleblowing Desk, Consumer Affairs

10 South Colonnade

Canary Wharf

London

E14 4PU

Tel: 020 7901 7121



## Anti-Bribery, Corruption, Fraud & Malpractice Policy

SIGNED:

A handwritten signature in black ink, appearing to read 'I. Beedham'.

Ian Beedham, Director

DATED: 2<sup>nd</sup> Jan 2025