

ABOUT THIS POLICY

The following policy reflects the wishes of the board at Surface Technology Services BV, and by extension its shareholders:

1. It is our policy to conduct all business in an honest and ethical manner. We take a zero-tolerance approach to the falsification of any company documentation/communications or any actions that are dishonest in their intent. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.
 - 1.1. This policy does not form part of any employee's contract of employment although every employee is expected to conform fully to its requirements. We may amend it at any time.

2. WHO MUST COMPLY WITH THIS POLICY?

- 2.1. This policy applies to all persons working for us at any of our locations or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, suppliers and business partners.

3. WHAT IS FRAUDULENT ACTIVITY?

- 3.1. Fraud: Deceit, trickery, dishonest practice, or breach of confidence, intentionally perpetrated for profit or to gain some unfair or dishonest advantage. This includes but is not limited to falsification of information, intentional omission, false pretences, and deliberate misuse of qualified resources or certification/qualification/authorization.
- 3.2. Theft: Dishonestly acquiring, using or disposing of physical or intellectual property belonging to the company or to individual members of the organisation.
- 3.3. Misuse of equipment: Deliberately misusing materials or equipment belonging to the company for financial or material benefit.
- 3.4. Abuse of position: Exploiting a position of trust within the organisation for financial or material benefit.
- 3.5. Any other activity that is dishonest in its intent.

4. ACTION REQUIRED UPON DISCOVERY

- 4.1. Fraudulent activities can be at an individual level, company level or in purchased goods and services (e.g counterfeit or misrepresented good or services received from supply chain)
- 4.2. If any staff member becomes aware of activities that can be considered fraudulent or dishonest in nature, as outlined in this document, he or she is responsible for reporting the incident to their direct line manager.
- 4.3. In the event that a member of staff feels compromised in talking to their direct line manager, he or she is responsible for reporting the incident to another senior person

- 4.4. If fraudulent activity is deemed to have taken place, the senior manager must report the finding at management level. The SLT will decide if notification to customers or external bodies is required.

5. CONSEQUENCES OF FRAUDULENT ACTIVITY.

- 5.1. The company will actively monitor for fraudulent activity and encourages a whistle blowing culture should any member of staff discover or suspect that any dishonest activity is taking place.
- 5.2. Senior management are expected to deal promptly, firmly and fairly with suspicions and allegations of fraud or corrupt practice,
- 5.3. Any fraudulent or dishonest activities can be considered an act of gross misconduct and will be dealt with accordingly.