



Bluestone Design & Construction Limited
7 Downley Road
Havant
Hampshire
PO9 2NJ
Tel: 023 9244 5100
Email: sales@bluestoneltld.com
Web: www.bluestoneroofing.co.uk

FRAUD MANAGEMENT PLAN POLICY STATEMENT

General

The content of this policy statement is to be disseminated to all employees, supply chain and other contracted personnel for their understanding. The policy is reviewed on an annual basis or following any significant event or legislative change. Personnel are expected to behave and act to high standards in the course of their employment and are to note that:

- All instances of suspected fraud will be investigated; and
- Where justified by evidence, all offences will be prosecuted.

Ethical Approach to Business Behaviour

We require full compliance with the law and an ethical approach in all business activities. Through working in a manner that encourages openness, collaboration, mutual dependency, and professional delivery we will actively discourage the behaviours which could lead to the potential for fraudulent activity to take place.

Allocation of Responsibilities

Responsibility for the overall implantation of this policy, including the Anti-Bribery and Corruption Policy lies with the Managing Director through the Security & Fraud Manager and downwards to all employees and Supply Chain managers, supervisors and staff. Our policy on fraud is reviewed following periodic audits designed to test the effectiveness of the procedures.

Duty of Personnel

All employees will:

- Comply with the law;
- Behave in an ethical and honest manner at all times and have high standards of integrity in carrying out their responsibilities;
- Be aware of the principles with which they must comply;
- Ensure they do not contravene any relevant Company procedures; and
- Refer to the Fraud Response Plan if any fraudulent act is suspected.

Duty of Managers

All managers will:

- Actively encourage an ethical approach to business behaviour and practices and lead by example;
- Ensure that all personnel (employees, agency staff, contractors and suppliers) are fully conversant and the Company, contract and project procedures;

- Ensure that procedures are subject to regular audit and personnel are monitored in their performance in relation to the procedures: and
- Implement effective personnel recruitment procedures, having particular regard to taking up references.

Duty of the Company

We will:

- Ensure that suitable and effective procedures are in place for deterring fraudulent activity:
- Verify that all personnel receive appropriate training to enable them to carry out their duties and responsibilities within their delegated authorities; and
- Publish appropriate procedures to control, detect and investigate fraud, which includes a Fraud Response Plan.

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Reporting Suspicions of Fraud

In support of the Public Interest Disclosure Act 1998 we encourage all personnel to raise genuine concerns about malpractice at the earliest practicable stage, preserving anonymity of the individuals making and disclosure where requested or deemed necessary. Reporting of incidents is highlighted within the Fraud Response Plan and covers such reporting as:

- Contracting the Whistle blowing hotline as advertised across all sites;
- Reporting directly to the Security & Fraud Manager; and
- Reporting through any director, manager or supervisor.

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Fraud Prevention and Awareness Training

Fraud prevention and awareness training is provided to all employees, Supply Chain and Specialist staff on a bi-annual basis. The training covers all aspects of legislative and company directives and is reviewed regularly to maintain currency. This training is regularly reviewed and is carried out during face-to-face sessions or by using the company computer based training facility.

Disciplinary Procedures

All relevant circumstances connected with an allegation or a suspicion of fraudulent activity will be fully investigated and the appropriate action taken. Theft, fraud, misrepresentation or other serious misdeeds are subject to our disciplinary procedures. Serious misdeeds include corruption, collusion, deception and the like when dealing with any aspect of the day to day duties, both internal and external throughout the supply chain management. In instances where grounds are discovered that personnel may be involved in fraudulent activity then our disciplinary procedures will be invoked. This could lead to dismissal and, where appropriate, prosecution. In other cases action will be taken with the appropriate employer.

Fraud Response Plan

Our Fraud Response Plan has been developed to deal with and minimise the damage caused by any fraud or attempted fraud.



R.L. Molyneux
Director



L.R. Medforth
Director

1 April 2026