

# Fraud Prevention Policy

Version 1.0 Date 01-09-25 Owner CFO

## Purpose

Stonbury takes a zero-tolerance approach to fraud under the law of any other country in which it does business and is committed to the prevention, deterrence and detection of fraud.

This document sets out the Group's policy against fraud (the "Policy") and the standards and procedures required to ensure compliance with the Policy within the Group, and for those working on its behalf.

The Group does not tolerate any form of fraud within its business and expects its officers, employees, subsidiaries and other associated persons to conduct themselves in accordance with this Policy. Compliance with this Policy is mandatory for all these persons.

## Scope

This policy applies to all group companies of Stonbury (Holdings) Ltd (the "Group"). It applies to all work activities undertaken on behalf of the businesses. Stonbury also requires all its business partners, contractors and agents to act in accordance with the underlying principles set forth in this Policy. This policy also applies to any activities that take place outside of the UK.

Although this Policy is non-contractual and may be reviewed from time-to-time, the business expects everyone to comply with its principles at all times. People will be held accountable for their behaviour in relation to this Policy

## Background

As a result of the Failure to Prevent Fraud (FTPF) Offence, Stonbury may be held criminally liable where a specified fraud offence (which is an offence under UK law, which could for example include activities outside of the UK affecting UK persons) is committed by an officer, employee, subsidiary or any other associated person for the benefit of Stonbury, unless able to demonstrate that reasonable fraud prevention procedures were in place.

## Related policies

This Policy should be read in conjunction with the Group's other policies and procedures related to financial crime, including: [Anti-Bribery and Corruption Group Policy](#), Whistleblowing Policy and the company's Employee Handbook, specifically the sections titled 'ANTI-BRIBERY & CORRUPTION POLICY OF INTENT' & 'WHISTLE-BLOWERS'.

## Relevant Offences

Fraud typically involves the intentional deception of a person for personal gain, often by misrepresentation, abuse of power, or concealment of facts. Individuals, such as those working for or on behalf of the Group, will typically be liable for their own fraudulent acts.

Legal persons may also be held liable for the actions of others and, in the case of the UK's FTPF Offence, those that are "associated" with them. This can include the Group's employees, agents, contractors, suppliers, joint ventures and subsidiaries, or any person who otherwise performs services for or on behalf of the Group where the fraudulent act was intended to benefit the business, even if the business was not aware nor did not sanction the act.

**Please Note**, the intended fraudulent gain or loss may be financial or non-financial. For example, a fraud intended to confer an unfair business advantage might be an offence. Equally, a fraud that disadvantaged a competitor might also be an offence.

### Training and communication

Training and refresher training on this Policy will be provided to all officers and employees of Stonbury and form part of the induction training

Stonbury's zero-tolerance approach to fraud will be communicated to all suppliers, contractors, business partners and other associated persons at the outset of our business relationship with them and as appropriate thereafter.

### Raising concerns

Officers, employees and other associated persons are strongly encouraged to raise questions or concerns at the earliest possible stage. This is covered in the company's whistle-blowing policy (contained in the Employee Handbook). Confidentiality will be ensured and no employee will suffer negative consequences from raising a concern in good faith.

### Risk Assessments

The business will use a risk assessment methodology to identify the areas of the business at high exposure or where the controls need improvement and act accordingly.

Any risk areas of concern or red-flags identified will be logged and routinely reviewed as part of the corporate risk management process

Adherence to controls will be monitored through the internal audit process

### Monitoring & review

The Board of Directors will have overall responsibility for this Policy and will oversee the status of its implementation.

The Group will keep records of, and regularly monitor, compliance with the procedures required by this Policy and will also keep records of any suspicious activity that has been identified.

The Group will periodically review the implementation of this Policy in respect of its suitability, adequacy and effectiveness and is committed to making improvements as appropriate.

Any revision to the policy is subject to the approval of the Board of Directors and will be communicated to relevant persons.

Approval

Signed by the CFO



Richard Ward

Date 1<sup>st</sup> September 2025