



Fraud Prevention Policy

James Fisher and Sons plc (“JFS”) is committed to ensuring the highest standards of legal and ethical compliance throughout JFS and all of its affiliated companies (“the JFS Group”). This includes compliance with all applicable fraud prevention laws and regulations including but not limited to the Economic Crime and Corporate Transparency Act 2023. Fraudulent conduct exposes the JFS Group and anyone involved to criminal prosecution, financial penalties or fines and may negatively impact the reputation of JFS Group. JFS condemns fraud in all its forms, whether direct or indirect, and has a zero tolerance to fraud conduct by or to the detriment of the JFS Group.

This policy establishes a framework for preventing, detecting and investigating fraudulent activities throughout the JFS Group to protect the JFS Group’s assets, reputation, stakeholders, customers and other third parties from the risks associated with fraud.

This policy applies to the JFS Group, its directors, all employees and contractors working for the JFS Group at all levels and grades wherever located and where applicable any third party performing services for or on behalf of the JFS Group.

Senior Management shall ensure that all Business Partners performing services for or on behalf of the JFS Group are notified and subjected to an appropriate level of due diligence in accordance with the [Business Partner Standard \(JFS-LGL-STN-003\)](#) and the [Business Partner Appointment Procedure \(JFS-COR-LGL-PRO-003\)](#).

Any person to whom this policy applies must not facilitate or engage in any Fraudulent Activity. All JFS Group employees must support a robust control environment for the prevention and detection of fraud and shall report any suspected fraud to their direct manager or local representatives of the legal or finance functions or in accordance with the [Whistleblowing Policy \(JFS-COR-LGL-POL-009\)](#).

Definitions

- Fraud: Any intentional deception or misrepresentation undertaken with a view to gain an advantage.
- Fraudulent Activity: Activities conducted directly or indirectly by any part of the JFS Group or to the detriment of the JFS Group that involve deceit, embezzlement, forgery, misrepresentation or any other dishonest acts for personal or financial gain.

Fraud Prevention

Senior Management shall:

- Provide anti-fraud training to all employees identified as requiring training on this policy.
- Encourage the promotion, adoption and enforcement of strong internal fraud controls and procedures.
- Conduct documented fraud risk assessments as part of ongoing risk management processes.
- Ensure that all JFS Group business is conducted ethically and according to the highest standards of integrity.

Fraud Detection

Senior Management shall implement fraud detection systems and processes commensurate with the applicable fraud risk exposure and act upon risk indicators when they arise including, but not limited to:

- Performing control self-assessment programmes.
- Conducting Internal Audits and reviews.
- Facilitating the reporting of all suspected cases of fraud in accordance with this policy and the [Whistleblowing Standard \(JFS-COR-LGL-STN-002\)](#).

Fraud Investigation

Senior Management shall ensure that all cases of actual, attempted or suspected fraud and any failure of the relevant fraud prevention or detection controls are investigated. Any fraud investigation shall be conducted in accordance with the [Whistleblowing Reporting and Investigations Procedure \(JFS-COR-LGL-PRO-005\)](#).



Senior Management are ultimately responsible for the compliance with this policy in their respective businesses or functions and to ensure that all employees identified as requiring training on this policy and all related standards and procedures receive and complete the requisite training. Non-compliance with this policy will not be tolerated and may result in disciplinary and other actions up to and including termination of employment or termination of a contractual relationship with third parties where applicable.



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Chief Financial Officer (CFO)