

# NRW HOLDINGS

## ANTI-FRAUD, BRIBERY AND CORRUPTION POLICY



NRW is committed to conducting business in accordance with the highest ethical and legal standards.

NRW has a 'zero tolerance' policy towards fraud, bribery and corruption and will thoroughly investigate and seek to take disciplinary and/or legal action against those who perpetrate, are involved in or assist with fraudulent or other improper activities in any of our operations.

NRW defines fraud as taking, attempting to take or obtaining by deception, money or any other benefit when not entitled to that benefit.

Bribery is offering, promising, giving or receiving a financial or other inducement with the intention of encouraging or ensuring a particular outcome. Inducements can take the form of gifts, loans, fees, rewards or other advantages.

Corruption is defined as offering, giving, soliciting or accepting an inducement or reward that may influence the actions taken by NRW employees, agency staff, contractors or external consultants.

NRW is committed to:

- Ensuring efficient and effective systems, procedures and internal controls are in place to enable the prevention and detection of fraud, bribery and corruption.
- Ensuring managers identify fraud, bribery and corruption risks in their areas of business and that all systems, procedures and internal controls are properly implemented and enforced.
- Ensuring all members of staff understand that they have a duty to report any internal and external suspicions or incidents of fraud, bribery or corruption.
- Continuously reviewing our systems, procedures and internal controls through risk management processes and audit arrangements.

We will provide adequate and appropriate resources to implement this policy and will ensure it is communicated and understood.

NRW will review this policy annually to reflect new legal and regulatory developments and to ensure best practice.

A handwritten signature in black ink, appearing to read 'Jules Pemberton', written in a cursive style.

Jules Pemberton  
**Chief Executive Officer**

July 2022