



Fraud and Malpractice Policy

Doc Ref: JSS-SMS-012-PL
Review: 31/01/2025
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Revision: 1.00

At **James Street Steel**, we are committed to maintaining the highest standards of integrity, accountability, and transparency in all our operations. This Fraud and Malpractice Policy aims to ensure that all employees, contractors, and stakeholders act ethically and responsibly, refraining from any fraudulent activities or malpractice that could compromise the trust and reputation of our organisation.

Scope

This policy applies to all employees, contractors, suppliers, and business partners engaged with **James Street Steel**, regardless of their position or role.

Definition of Fraud and Malpractice

- **Fraud** refers to any intentional act or omission designed to deceive, manipulate, or misrepresent information for personal gain or the benefit of others. This may include, but is not limited to, falsification of records, misappropriation of funds, bribery, or embezzlement.
- **Malpractice** refers to the negligent, unethical, or unlawful conduct or performance of any duties or services that fall below the standard expected by **James Street Steel** or legal regulations.

Policy Principles

1. Zero Tolerance for Fraud and Malpractice

James Street Steel has a zero-tolerance policy for any form of fraud or malpractice. Any employee or individual found engaging in fraudulent or unethical behaviour will face disciplinary action, which may include termination of employment, legal action, and restitution.

2. Reporting and Disclosure

We encourage all individuals to report any suspected fraud or malpractice immediately. Reports should be made to the Managing Director and can be done anonymously if preferred. We will thoroughly investigate all allegations while maintaining confidentiality and ensuring protection from retaliation for good-faith reporting.

3. Investigation Process

Any reports of fraud or malpractice will be investigated promptly and thoroughly. An impartial investigation will be conducted to determine the facts, and any individual found responsible for such activities will be held accountable according to the severity of the offense.

4. Preventive Measures

James Street Steel will implement measures, including training programs, internal audits, and regular reviews, to minimise the risks of fraud and malpractice. These initiatives aim to educate employees and partners on ethical practices and the consequences of fraudulent behaviour.

5. Compliance with Laws and Regulations

All employees, contractors, and partners must comply with all applicable laws, regulations, and professional standards regarding fraud prevention and ethical conduct.



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Consequences for Violations

Individuals found to be in violation of this policy will face appropriate disciplinary action, including but not limited to:

- Termination of employment or contracts
- Legal prosecution, including civil or criminal charges
- Financial restitution, if applicable
- Reporting to relevant regulatory authorities

Commitment to Ethical Conduct

At **James Street Steel**, we are dedicated to fostering a culture of honesty, transparency, and accountability. We expect all individuals to uphold the highest ethical standards in their conduct and interactions, both within the organisation and with external stakeholders.

Policy Review

This policy will be reviewed periodically to ensure its effectiveness and relevance. Updates and revisions will be made as necessary to address emerging risks or changes in legislation.

Conclusion

By adopting this Fraud and Malpractice Policy, we reaffirm our commitment to ethical conduct and the integrity of our operations. All individuals associated with **James Street Steel** are expected to act in accordance with these principles to maintain trust and ensure the continued success of the organisation.

Signature: _____

James Street Steel Managing
Director

Date: 31/01/2025