






-  **TRUE HIRE**
-  **TRUE GRAB**
-  **TRUE AGGREGATES**
-  **TRUE LEASE**
-  **TRUE HAULAGE**
-  **TRUE SALES**

## ANTI-ECONOMIC CRIME POLICY

### 1. Introduction

- 1.1 We are committed to maintaining the highest legal and ethical standards in all our business dealings and relationships and to playing our part to combat fraud, facilitation of tax evasion, bribery & corruption, sanctions breaches and money laundering (“**economic crime**”).
- 1.2 This policy (“**policy**”) covers:
  - 1.2.1 our expectations in relation to countering economic crime; and
  - 1.2.2 our responsibilities, and of those working for and on our behalf, in observing and upholding our position on preventing economic crime.
- 1.3 This policy should be read in conjunction with the True Group Ethics Code, Government Anti-Economic Crime Guidance and the Sanctions Check Guidance & Procedure.
- 1.4 In this policy, third party means any individual or organisation you encounter during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, intermediaries, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.
- 1.5 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

### 2. Who is Responsible for this Policy?

- 2.1 The True Plant Hire Ltd T/A True Group board of directors has overall responsibility for this policy and its compliance with its legal and ethical obligations, and that all those working for and on behalf of the company comply with it.
- 2.2 The primary and day-to-day responsibility for implementing, monitoring the use and effectiveness of, dealing with any queries about, and auditing internal compliance control systems and procedures in respect of this policy sits with the company’s Business Leadership Team.
- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy, related procedures and guidance and are given adequate and regular training on it.
- 2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to our Tom MacFarlane.

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### **3. Who must Comply with this Policy?**

- 3.1 This policy applies to all persons working for the company or on behalf of the company in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.
- 3.2 You must ensure that you read, understand and comply with this policy.
- 3.3 The prevention, detection and reporting of economic crime are the responsibility of all those working for us or under our control.
- 3.4 You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.5 This policy should be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter and compliance with this policy should be incorporated into their engagement contract.
- 3.6 If you believe or suspect that a conflict with this policy has occurred or may occur in the future, you must report it as soon as possible.

### **4. How to Raise a Concern**

- 4.1 You are encouraged to raise concerns about any issue or suspicion of economic crime, including if you encounter any of the red flags contained in Appendix 2 of the Anti-Economic Crime Guidance, at the earliest possible opportunity.
- 4.2 Having read this policy and the Anti-Economic Crime Guidance, if you are unsure about whether a particular act constitutes economic crime, raise it with your line manager, Managing Director, or through the Whistleblowing Policy as soon as possible.
- 4.3 If you believe or suspect that any economic crime or other breach of this policy has occurred or may occur, you must notify your line manager, Managing Director, or report it in accordance with our Whistleblowing Policy as soon as possible.
- 4.4 “Turning a blind eye” to suspicious activity is not acceptable.
- 4.5 Individuals who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. For further information please refer to our Whistleblowing Policy.

### **5. Breaches of this Policy**

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct, as well as potential civil and criminal liability.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## **6. Changes to this Policy**

- 6.1 We keep this policy under regular review and reserve the right to change it at any time to meet our legal and ethical obligations. Unless required sooner, it is on a three (3) year policy review cycle. It is your responsibility to ensure that your knowledge of this policy is up to date and that you comply with its terms.

## **7. Fraud**

- 7.1 Fraud is the deliberate or intentional use of misrepresentation, deception or dishonesty to deprive, in order to make a gain or achieve an advantage for someone or something or to disadvantage or cause loss (usually financial) to another person or party.
- 7.2 It is not acceptable for you (or someone on your behalf) to:
- 7.2.1 engage or assist another in any fraudulent activity, including but not limited to the offences set out in this policy;
  - 7.2.2 aid, abet, counsel or procure the commission of any fraud by another person;
  - 7.2.3 engage in any other activity that might lead to a breach of this policy; or
  - 7.2.4 threaten or retaliate against another individual who has refused to commit a fraud offence or who has raised concerns under this policy.
- 7.3 You must comply with the company's policies, procedures, guidance and training that relate to fraud prevention, including but not limited to:
- 7.3.1 Financial transaction procedures and controls and reporting requirements;
  - 7.3.2 Pre-employment and vetting checks for all employees;
  - 7.3.3 Supply chain due diligence and management;
  - 7.3.4 Client, business partners, agent & intermediate due diligence;
  - 7.3.5 Sanctions checks;
  - 7.3.6 Managing conflicts of interest; and
  - 7.3.7 Cyber security measures.

## **8. Facilitation of Tax Evasion**

- 8.1 Tax evasion facilitation means being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person, or aiding, abetting, counselling or procuring the commission of that offence. Tax evasion facilitation is a criminal offence, where it is done deliberately and dishonestly.
- 8.2 It is not acceptable for you (or someone on your behalf) to:
- 8.2.1 engage in any form of facilitating tax evasion or foreign tax evasion;
  - 8.2.2 aid, abet, counsel or procure the commission of a tax evasion offence or foreign tax evasion offence by another person;

- 8.2.3 fail to promptly report any request or demand from any third party to facilitate the fraudulent evasion of tax (whether UK tax or tax in a foreign country), or any suspected fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person, in accordance with this policy;
  - 8.2.4 threaten or retaliate against another individual who has refused to commit a tax evasion offence or a foreign tax evasion offence or who has raised concerns under this policy; or
  - 8.2.5 engage in any other activity that might lead to a breach of this policy.
- 8.3 You must follow the company's policies, procedures, guidance and training that relate to tax evasion prevention, including but not limited to:
- 8.3.1 Financial transaction procedures and controls and reporting requirements;
  - 8.3.2 due diligence on new third-party business arrangements;
  - 8.3.3 consulting with the Accounts Team regarding any business or person identified as high risk;
  - 8.3.4 checking contractual terms meet legislative requirements for prevention of facilitation of tax evasion; and
  - 8.3.5 undertaking regular audits and review of existing commercial relationships (i.e. on an annual basis or when there has been a material change, such as change in jurisdiction, billing regularity).

## **9. Bribery and Corruption**

- 9.1 Bribery is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.
- 9.2 It is not acceptable for you (or someone on your behalf) to:
- 9.2.1 give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
  - 9.2.2 give or accept any gift or any hospitality during any commercial negotiations or tender process;
  - 9.2.3 accept a payment, gift or hospitality from a third party that you know, or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return;
  - 9.2.4 accept gifts or hospitality from a third party that does not meet the guidelines set out in the Anti-Economic Crime Guidance;
  - 9.2.5 offer or accept a gift to or from government officials or representatives, or politicians or political parties, without the prior approval of your Divisional Director, Managing Director or our General Counsel & Company Secretary;
  - 9.2.6 make or accept facilitation payments or "kickbacks" of any kind in any jurisdiction;

- 9.2.7 threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; or
  - 9.2.8 engage in any other activity that might lead to a breach of this policy.
- 9.3 You must comply with the company's policies, procedures, guidance and training that relate to combatting bribery and corruption.

## **10. Money Laundering**

- 10.1 Money laundering is the process through which the proceeds of crime (so-called dirty money) are processed and converted into assets that appear to have a legitimate origin.
- 10.2 It is not acceptable for you (or someone on your behalf) to:
- 10.2.1 enter or become involved in any way in an arrangement which you know, or suspect facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person;
  - 10.2.2 fail to promptly report any suspected money laundering or suspicious activities;
  - 10.2.3 inform anyone where a suspicious activity has been reported, or if there is a law enforcement investigation intended or underway, as to do so could prejudice any investigation that may be conducted following the disclosure having been made;
  - 10.2.4 engage in any other activity that might lead to a breach of this policy; or
  - 10.2.5 threaten or retaliate against another individual who has refused to engage in any activity that they suspect may involve money laundering or who has raised concerns under this policy.
- 10.3 You must comply the company's policies, procedures, guidance and training that relate to money laundering prevention, including but not limited to:
- 10.3.1 due diligence on all clients, suppliers, intermediaries, agents and business partners;
  - 10.3.2 financial transaction procedures and controls, in particular the issue and payment of invoices; and
  - 10.3.3 undertaking regular risk assessments in respect of money laundering risks in our business.
- 10.4 True Plant Hire Ltd T/A True Group does not handle client funds, and you should refuse any request to do so.

## **11. Sanctions**

- 11.1 Sanctions are restrictive measures imposed against individuals, entities, countries, territories, governmental organisations and sectors by sanctions authorities. The most frequently applied measures imposed by sanctions are arms embargoes, financial restrictions on designated individuals and entities, travel bans, export controls and trade restrictions.
- 11.2 You must always act in accordance with the applicable US, UK, UN and EU sanctions, as well as any other sanctions regimes which apply locally.

- 11.3 It is not acceptable for you (or someone on your behalf) to:
- 11.3.1 enter or become involved in any way in an arrangement which you know, or suspect may have connections or ties to a sanctioned individual, entity, country or territory;
  - 11.3.2 fail to promptly report any suspected sanctioned activities;
  - 11.3.3 engage in any other activity that might lead to a breach of this policy; or
  - 11.3.4 threaten or retaliate against another individual who has refused to engage in any activity that they suspect may involve restricted activities or who has raised concerns under this policy.
- 11.4 You must comply with the company's policies, procedures, guidance and training that relate to sanctions compliance, including but not limited to:
- 11.4.1 the Sanctions Check Guidance & Procedure;
  - 11.4.2 due diligence on clients, suppliers, intermediaries, agents and business partners;
  - 11.4.3 processing financial transactions;
  - 11.4.4 escalating any high risks identified from your due diligence or financial transactions to your Managing Director.

**This Policy has been approved and adopted by the True Plant Hire Ltd T/A True Group Board.**

*T. MacFarlane*

**Tom MacFarlane, MD**

**Date: 20.08.25**

**Review date: 20.08.26**