



**DORNAN**  
A Turner Company

Dornan Engineering Limited its Subsidiaries and Branches  
Hereafter for the purpose of this Policy known as **Dornan**

# ANTI-FRAUD STATEMENT



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NOVEMBER 2025



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## CONTENTS

|     |                                  |   |
|-----|----------------------------------|---|
| 1.  | STATEMENT OF COMMITMENT.....     | 2 |
| 2.  | SCOPE .....                      | 2 |
| 3.  | UNDERSTANDING FRAUD RISKS.....   | 2 |
| 4.  | RISK ASSESSMENT .....            | 2 |
| 5.  | FRAUD PREVENTION PROCEDURES..... | 2 |
| 6.  | DUE DILIGENCE.....               | 3 |
| 7.  | TRAINING AND COMMUNICATION ..... | 3 |
| 8.  | MONITORING AND REVIEW .....      | 3 |
| 9.  | GOVERNANCE .....                 | 3 |
| 10. | LEGAL COMPLIANCE.....            | 3 |

# **DORNAN ANTI-FRAUD STATEMENT**

## **1. STATEMENT OF COMMITMENT**

Dornan is committed to conducting all business activities with the highest standards of integrity, transparency, and accountability. We operate a strict zero-tolerance policy towards fraud and are dedicated to preventing, detecting, and responding to fraudulent activity in any form. This commitment is embedded at every level of Dornan and is supported by robust governance and oversight.

Every employee and Business Partner must uphold these standards, act honestly and ethically at all times. Dornan encourages a culture of openness, where concerns about suspected fraud can be raised in good faith and without fear of retaliation. We expect everyone acting on behalf of Dornan to play an active role in safeguarding Dornan against fraud.

## **2. SCOPE**

This Statement applies to all employees, Business Partners and any other associated persons behalf of Dornan, whether in the UK or internationally, where there is a UK nexus. For the purpose of this statement, “employees” and “Business Partners” are defined in the [Employee Code of Conduct](#) and the Code of [Conduct for Business Partners](#) respectively.

## **3. UNDERSTANDING FRAUD RISKS**

We recognise that fraud can occur in various forms, including but not limited to:

- False representation;
- Failure to disclose information;
- Abuse of position;
- Collusion in procurement or bidding;
- Misreporting financial or ESG data.

## **4. RISK ASSESSMENT**

We regularly assess fraud risks across our operations, including areas where the organisation could benefit from fraudulent conduct. These assessments inform the design and implementation of proportionate, risk-based procedures tailored to our business model and sector.

## **5. FRAUD PREVENTION PROCEDURES**

We have implemented a comprehensive framework of internal controls to prevent fraud, including but not limited to:

- Segregation of duties and approval hierarchies;

- Financial audits;
- Data analytics and transaction monitoring;
- Contractual safeguards with third parties.

These procedures are reviewed and updated periodically to ensure they remain effective and proportionate.

## **6. DUE DILIGENCE**

We conduct thorough due diligence on all Business Partners, including, but not limited to:

- Background checks;
- Financial vetting;
- Ongoing monitoring;
- Contractual clauses addressing fraud risk.

This helps ensure that those acting on our behalf uphold our standards and values.

## **7. TRAINING AND COMMUNICATION**

All staff receive fraud awareness training during onboarding and through annual refresher courses. Dornan provides secure and anonymous channels for reporting suspected fraud or misconduct, ensuring confidentiality and protection from retaliation.

## **8. MONITORING AND REVIEW**

Our Anti-Fraud framework is subject to continuous monitoring and periodic review. The framework is reviewed at least annually and after any significant incident. All decisions and updates to our procedures are documented, and lessons learned from incidents are shared with relevant staff to strengthen our controls.

## **9. GOVERNANCE**

Responsibility for fraud prevention rests with Senior Management and the Legal, Compliance, and Data Protection Department (the “LCD”). Suspected fraud must be reported immediately to the LCD, which will initiate a prompt and thorough investigation in accordance with established procedures.

Dornan provides secure and confidential whistleblowing channels that are available to all employees, Business Partners and associated persons for reporting concerns or suspected fraud, ensuring protection against retaliation.

## **10. LEGAL COMPLIANCE**

This Statement is aligned with the UK’s Failure to Prevent Fraud offence under the Economic Crime and Corporate Transparency Act 2023. We aim to meet the legal requirements of

having “reasonable procedures” in place to prevent fraud committed by employees, Business Partners and associated persons.