

FRAUD PREVENTION POLICY

ABOUT THIS POLICY

The Restaurant Group is committed to conducting its business with the highest ethical standards and preventing all forms of fraud. This Fraud Policy Statement outlines the group's zero-tolerance approach to fraud and establishes a framework for its detection, investigation and reporting.

This policy sets out the baseline standards for TRG's UK operations. Individual divisions or brands may choose to adopt further policies and procedures, or implement additional requirements, provided they are not inconsistent with this policy.

DEFINITION OF FRAUD

Fraud is any deliberate act of deception intended to cause the company or group a financial or other loss, or to obtain a benefit for the perpetrator or a third party. This includes, but is not limited to:

- Theft of cash, assets, or intellectual property
- False accounting entries or manipulation of financial records
- Credit card fraud
- Cheque fraud
- False expense claims
- Bribery and corruption
- Cybercrime

RELEVANT LEGISLATION

This policy is designed to comply with all relevant UK legislation, including:

- The Proceeds of Crime Act 2002
- The Serious Fraud Office Act 2002
- The Fraud Act 2006
- The Bribery Act 2010
- The Economic Crime and Corporate Transparency Act 2023

FRAUD PREVENTION MEASURES

The company implements a range of measures to prevent fraud, including:

Strong Internal Controls

Robust internal controls over financial processes, inventory management and IT systems.

Delegation of Authority

Authorisation levels for approving expenditure and capital or contractual commitments are clearly laid out in a DoA Matrix which is reviewed annually by the Board and are integrated into the group's financial systems.

Anti-Bribery Policy

Staff are prohibited from accepting any inducements intended to confer any benefit or advantage to the provider, and a strict reporting and recording process for any offers or receipt of gifts and hospitality is in place across all divisions and functions.

Employee Training

Regular training to employees on fraud awareness, red flags and reporting procedures.

Whistleblowing Policy

Employees are encouraged to report suspected fraud confidentially and without fear of reprisal through a well-defined whistleblowing policy.

Due Diligence

Appropriate due diligence procedures for third-party vendors and business partners.

Cybersecurity Measures

Appropriate cybersecurity measures to protect sensitive data and systems from unauthorised access.

FRAUD DETECTION AND INVESTIGATION

TRG has procedures in place for the detection and investigation of suspected fraud, including:

- Regular review of financial statements and reports for anomalies or inconsistencies
- Utilisation of data analytics tools to identify suspicious activity patterns
- Prompt investigations of any red flags or reports of suspected fraud
- Preservation of all relevant evidence during a fraud investigation

REPORTING FRAUD

All suspected fraud must be reported to the Group Finance Director, as the designated fraud officer. The company may also be required to report certain types of fraud to the authorities, such as the police or the Serious Fraud Office.

CONSEQUENCES OF FRAUD

Any employee found to have committed fraud will be subject to disciplinary action, up to and including termination of employment. The Company may also pursue legal action to recover any losses incurred.

COMMUNICATION AND TRAINING

This Fraud Policy is communicated to all employees to ensure they understand their responsibilities in preventing and reporting fraud. Training is provided to employees on fraud awareness and the company's reporting procedures.

REVIEW AND UPDATE

This Prevention of Fraud Policy will be reviewed and updated periodically to reflect changes in legislation, industry best practices and the group's business operations.

Reviewed/updated: July 2024

Approved for renewal by the TRG Board: 30 July 2024