# Q2.5 Anti-Fraud Policy

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## Introduction

This policy outlines our approach to preventing and addressing fraud and dishonesty. Directors, staff, and volunteers must lead by example. External parties (e.g., suppliers, contractors) must act with integrity and without intent to commit fraud. Senior management must deal promptly and fairly with suspicions and allegations of fraud.

## Policy Statement

We are committed to honest, accurate, transparent, and accountable financial and administrative processes. Any behavior falling short of these principles will not be condoned. All members must report any breaches they discover.

## Detection and Investigation

- **Alertness**: Directors, staff, volunteers, and the public play a key role in detecting fraud.
- **Reporting**: Notify the Managing Director immediately of any suspected irregularities.
- **Investigation**: The Managing Director will appoint a designated officer or auditor to investigate. They will:
    - Handle the matter promptly
    - Secure and keep evidence confidential
    - Work with senior managers and external agencies (e.g., Police, Courts)
    - Ensure maximum recoveries and assist in disciplinary actions

## Training

- **Induction and Refresher Training**: Regular training for all personnel involved in internal control systems to highlight and reinforce their responsibilities.

## Definition of Terms

- **Fraud**: Deliberate intent to acquire money or goods dishonestly.
- **Theft**: Dishonestly acquiring, using, or disposing of property.
- **Misuse of Equipment**: Deliberately misusing company materials or equipment.
- **Abuse of Position**: Exploiting a position of trust or authority within the organisation.

## Responsibility

- **Managing Director**: Manages fraud risk, establishes an anti-fraud response plan, designs a control environment, reports fraud issues, liaises with auditors, and ensures staff awareness and action.
- **Senior Management Team**: Ensures internal controls exist and operate effectively, prevents and detects fraud, assesses risks, reviews control systems, and protects whistleblowers.

## Relevant Legislation

- **Fraud Act 2006**

## Risks of Non-Compliance

Non-compliance can lead to fines, lawsuits, license revocation, prosecution, imprisonment, and reputational damage.

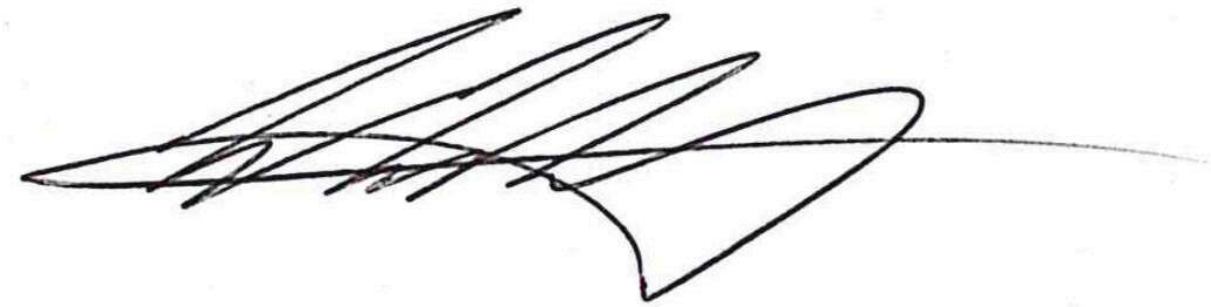
## Individual Responsibilities

- **Propriety**: Use company resources and handle funds properly.
- **Alertness**: Be aware of unusual events or transactions.
- **Reporting**: Report suspected fraud immediately to Mark Manley, Managing Director.
- **Cooperation**: Cooperate fully with investigations.

## Consequences of Non-Compliance

Any and all persons committing fraud face strict penalties, including dismissal, fines, and imprisonment.

This policy is approved by the undersigned and is supported by all the levels of management within the organisation. All personnel shall be guided by the contents of the SHEQ Management System and no deviation from the methods and procedures set down shall be permitted. This policy applies to everyone working for or on behalf of the company, including employees, directors, officers, associates, agency workers, volunteers, interns, contractors, consultants, third-party representatives, business partners, and sponsors. This policy is under continuous review.



Name - Mark Manley

Role - Managing Director

Date - 09/05/2025

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