



Counter Fraud and Anti-Bribery Policy

Introduction

Our organisation is committed to maintaining the highest standards of integrity, transparency, and ethical conduct. This policy outlines our approach to counter fraud and prevent bribery.

Scope

This policy applies to all employees, contractors, volunteers, trustees, donors, and related third parties.

Definitions

- **Fraud:** A range of activities including deception, bribery, forgery, extortion, corruption, theft, embezzlement, and money laundering.
- **Bribery:** Offering, promising, providing, or receiving inducements or rewards to gain commercial, contractual, regulatory, or personal advantage.
- **Third Parties:** Individuals/groups not employed by us but with a connection to our organization.

Policy Elements

1. **Zero Tolerance:** We have a zero-tolerance approach to fraud, bribery, and corruption.
2. **Reporting Channels:**
 - Employees and others must report any suspicions of fraud or bribery promptly.
 - Anonymous reporting mechanisms are available.
3. **Investigation Process:**
 - All reports will be thoroughly investigated.
 - Disciplinary action will be taken against violators.
4. **Retaliation Protection:**
 - We protect whistleblowers from retaliation.
 - Anyone reporting in good faith will not face adverse consequences.
5. **Training and Awareness:**
 - Regular training on fraud prevention and anti-bribery measures.
 - Raising awareness across the organisation.

6. Risk Assessment and Mitigation:

- Regular risk assessments to identify vulnerabilities.
- Implementing controls to reduce risks.

Effective Date

This policy is effective immediately.