

## POL013 Bribery, Fraud and Malpractice Policy Statement



I as Managing Director understand the prevalence of bribery, fraud and malpractice in the commercial environment and the negative impact it could have on Wembley Innovation Ltd, its employees and clients.

Neither my Board Members nor I condone nor will tolerate bribery, fraud or malpractice in any way, shape or form.

The organisation requires all staff, always, to act honesty and with integrity and to safeguard the resources for which they are responsible. Fraud is an ever-present threat to these resources and hence must be a concern to all members of staff. The purpose of this statement is to set out responsibilities about the prevention of fraud.

The Bribery Act 2011 describes those actions as: theft, deception, bribery, forgery, corruption, false accounting and conspiracy to commit these offences. For practical purposes fraud may be defined as the use of deception with the intention of obtaining an advantage, avoiding an obligation or causing loss to another party.

I will strive to:

- Develop and maintain effective controls to prevent fraud.
- Carrying out vigorous and prompt investigations if fraud occurs.
- Take appropriate legal and/or disciplinary action against perpetrators of fraud.
- Take disciplinary action against supervisors where supervisory failures have contributed to the commission of the fraud.

My Directors, Managers and Supervisors will be responsible for:

- Identifying the risks to which systems and procedures are exposed.
- Developing and maintaining effective controls to prevent and detect fraud.
- Ensuring that controls are being complied with.

Individual members of staff are responsible for:

- Acting with propriety in the use of official resources and in the handling and use of corporate funds whether they are involved with cash or payments systems, receipts or dealing with contractors or external providers.
- Reporting details immediately to the Managing Director in line with the company Whistleblowing Procedure if they suspect that a fraud has been committed or see any suspicious acts or events.

Any instances of suspected bribery, fraud or malpractice reported to the Managing Director may be made with full anonymity and in the strictest of confidence. They will be recorded, investigated and if necessary acted upon in line with the company's Disciplinary Procedures and UK Law.

A handwritten signature in black ink, consisting of a stylized 'L' and 'C', enclosed within a hand-drawn oval.

Liam Clear  
Managing Director  
Wembley Innovation Ltd

October 2019