
	Fraud Policy			
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1. The Company requires all staff at all times to act with honesty and with integrity and to safeguard the resources for which they are responsible. This policy applies to any irregularity involving employees as well as consultants, contractors and/or any other parties with a business relationship with the Company.

Any investigation required will be conducted without regard to any person's relationship with the Company, position or length of service.

2. The term fraud is used to describe such acts as theft, deception, bribery, forgery, corruption, false accounting and conspiracy to commit these offences. 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.

3. a) The Company will be responsible for:

- Developing and maintaining effective controls to prevent fraud.
- Carrying out prompt investigations if fraud occurs.
- Taking appropriate legal and or disciplinary action against perpetrators of fraud.

b) Managers 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.


c) All employees 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 payment systems, receipts or dealing with contractors or suppliers.
- Reporting details immediately to their line manager or next most senior manager if they suspect that a fraud has been committed or see any suspicious acts or events - this could involve the Police.

4. All employees can be confident that they will not suffer in any way as a result of reporting reasonably held suspicions of fraud. For these purposes, reasonably held suspicions shall mean any suspicions other than those which are raised maliciously and found to be groundless.

A full copy of this policy is accessible electronically and is available from the SHEQ Dept. on request.

This Policy will be reviewed annually as a minimum and fully supports the policies and procedures within our Management System.

Signature: 

Steven Sankey, MD