



Multi Services Kent

Fraud & Corruption Policy

1.0 Introduction

- 1.1 Multi Services Kent Ltd (MSK) is determined to maintain its reputation as a reputable Company, which will not tolerate fraud, corruption or abuse of position for personal gain, wherever it may be found in any area of its activities.
- 1.2 The purpose of this Policy Statement is to set out for all employees the main principles for countering fraud and corruption.
- 1.3 The Policy statement includes: -
 - the scope;
 - the culture and the stance against fraud and corruption;
 - how to raise concerns and report financial malpractice;
 - the principle of having an anti-fraud & corruption strategy;
 - the responsible officer.

All employees should play a key role in counter-fraud initiatives. This includes providing a corporate framework within which counter-fraud arrangements will flourish, and the promotion of an anti-fraud culture across the whole of the Company. This should provide a sound defence against internal and external abuse of Company funds.

- 1.5 The relevant definitions are as follows;
 - Fraud is the "intentional distortion of financial statements or other records by persons internal or external to the organisation, which is carried out to conceal the misappropriation of assets or otherwise for gain."
 - Corruption is the "offering, giving, soliciting or acceptance of an inducement or reward which may improperly influence the action of any person."

2.0 Scope

- 2.1 The Policy Statement applies to all employees (full time, part time, temporary and casual) who work for MSK Ltd. The term "officer" includes all types of employees of MSK.
- 2.2 MSK expects that individuals and organisations (e.g. suppliers, contractors, and service providers) that it deals with will act with integrity and without thought or actions involving fraud and corruption. Where relevant, MSK will include appropriate clauses in its contracts about the consequences of fraud, bribery and corruption; evidence of such acts are most likely to lead to a termination of the particular contract and may lead to prosecution.

3.0 Culture and Stance Against Fraud & Corruption

- 3.1 Responsibility for an anti-fraud culture is the joint duty of all those involved in giving direction, determining policy and management. The strategy should be directed against fraud and corruption whether it is attempted against MSK from outside or from within its own workforce.
- 3.2 MSK expects that employees at all levels will lead by example in ensuring adherence to legal requirements, contracts procedure rules, financial procedure rules, codes of conduct and best (professional) practice.
- 3.3 As part of this culture, MSK will provide clear routes by which concerns can be raised by employees (full time, part time, temporary and casual).

3.4 Senior Management is expected to deal swiftly and firmly with those who defraud MSK or who are corrupt. MSK, including Directors and Senior Management, will be robust in dealing with financial malpractice.

4.0 Raising Concerns

4.1 Although this document specifically refers to fraud and corruption, it equally applies to any forms of malpractice that can reduce confidence in MSK and its services, and may also include acts committed outside of official duties but which impact upon MSK's trust in the individual concerned. Examples may include, the criminal acts of theft of "property", which includes all assets and cash; false accounting; obtaining by deception; pecuniary advantage by deception; computer abuse and computer crime. Also, it includes bribery and corruption. All employees can be exposed to a number of "pressures", from outside influences to act in a particular way in a particular case; this may involve "favouritism" regarding the access to all kinds of services and benefits.

4.2 The employees of MSK are an important element in MSK's stance on fraud and corruption, and they are positively encouraged and expected to raise any concerns that they may have on these issues where they are associated with MSK's activities.

4.3 Employees should normally raise concerns through their immediate manager, however it is recognised that they may feel inhibited in certain circumstances. In this case, employees should contact either the Managing Director or Chairman.

Concerns will be treated in confidence, properly investigated and dealt with fairly.

4.5 There is, of course, a need to ensure that any investigation process is not misused, therefore, any internal abuse, such as raising malicious or vexatious allegations, may be dealt with as a disciplinary matter.

5.0 Anti-Fraud & Corruption Strategy

5.1 This Policy Statement also forms an important part of the Anti-Fraud & Corruption Strategy by setting out the tone, culture and expectations of MSK, as part of the corporate framework.

5.2 The Strategy involves the corporate framework, prevention, deterrence, detection and investigation, action and recovery; details of these key features are shown in the Strategy itself.

6.0 The Responsible Officer

6.1 The Responsible Officer is responsible for ensuring that MSK has control systems and measures in place "to enable the prevention and detection of inaccuracies and fraud, and the ability to reconstitute any lost records". An Anti-Fraud & Corruption Policy Statement and Strategy helps towards discharging part of this responsibility.

6.3 Accordingly, The Responsible Officer will:-

- take overall responsibility for the maintenance and operation of this Policy;
- promote awareness of the principles and practices it contains;
- maintain records of financial malpractice, including concerns and allegations received, matters arising from audits, investigations and evidence and the outcomes;
- report as necessary to MSK.

All aspects of this policy shall remain in force and open to periodic review at any time.

Signed:



Date:

15:07:2020

Mark Doughty
Managing Director