

### **Policy Statement**

Our Company values its reputation for financial probity and reliability and recognises that over and above any financial damage suffered, fraud may reflect adversely on its image and reputation. Its aim, therefore, is to limit its exposure to fraud by:

- Instituting and maintaining cost effective measures and procedures to deter fraud
- Taking firm and vigorous action against any individual or group perpetrating fraud against the Group, its shareholders or its customers
- Encouraging its employees to be vigilant and to report any suspicion of fraud, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- Rigorously investigating instances of alleged fraud and pursuing perpetrators to seek restitution of any assets fraudulently obtained and the recovery of costs
- Assisting the Police and other appropriate authorities in the investigation and prosecution of those suspected of fraud

### **Aims of the Policy**

To document clearly the Company's attitude to and stance on, fraud and malpractice.  
To demonstrate to internal and external shareholders that the group deals with fraud in an appropriate manner.

### **Scope**

This Policy applies to all McTaggart Group employees and extends to all our business dealings and transactions, in all areas in which we operate.

### **Internal controls**

We have preventative measures in place including internal controls, which are designed to prevent fraud and malpractice occurring in the first instance. These consist of rules, regulations, policies and procedures within which employees, agency staff, consultants and contractors are expected to operate and include:

- A Code of Conduct;
- Disciplinary procedures for employees;
- Delegated authorities;
- Financial Principles and Regulations

It is the responsibility of all Managers' to actively deter, prevent and detect fraud and malpractice by maintaining good control systems and ensuring their staff are familiar with them.

### **External reporting**

It is the policy of the Company to report all known criminal activity to the Police for investigation by them. The timing of Police involvement will be at the discretion of the Board of Directors.

Similarly, the Company will report other breaches discovered in the course of investigations to the relevant authorities including HM Customs and Excise, Inland Revenue, Financial Services Authority etc.

### **Fraud & Malpractice Reporting**

It is the responsibility of all staff to be alert for occurrences of fraud or any malpractice and to be aware that unusual events, transactions or behaviours could be indications of fraud or malpractice or attempted fraud or malpractice. Employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage. Any suspicion of, or if you are aware of any suspected fraud or malpractice, should be reported to your Line Manager. In addition, it should be reported to the Human Resources Manager.

### **Training and communication**

We will communicate this Policy and relevant guidance to all employees. We will also communicate this Policy to our suppliers and contractors.

Managers and employees will receive relevant training in how to implement this Policy, in the scope of their employment with the Company.

### **Policy review**

This policy will be reviewed every three years, or earlier if an amendment is deemed necessary and will be approved by the Management Team.



Gary Climson  
Managing Director  
McTaggart Group

Last review date: March 2019