



Rambert Grades Fraud Policy

2024

Purpose

This policy has been developed to provide a framework for the prevention and detection of fraud, bribery and corruption and a robust process to be followed in the event that a fraud, act of bribery or corruption is suspected.

Scope

This policy and procedure is designed to cover all activities that may be considered connected to fraud, bribery or corruption and is applicable across all levels of the business, its employees and its casual staff.

Definitions

Fraud is: - deliberate deception to secure unfair or unlawful gain, or to deprive a victim of a legal right

Bribery is: an illegal or unethical gift or lobby effort bestowed to influence the recipient's conduct

Corruption is: dishonest or fraudulent conduct by those in power, often (but not always) involving bribery

In line with the above definitions Rambert Grades considers a breach of this policy to have taken place where the assets, including income generated by the organisation, is used for the benefit of individuals, groups or organisations other than that to which it was intended. Fraud would also be considered if any

individual, group or organisation falsified an association with Rambert Grades or used its association with Rambert Grades to benefit themselves without the knowledge or understanding and consent of Rambert Grades.

Rambert Grades recognises that market practices vary across the world and what is accepted in one territory is not accepted in another. In accordance with the provisions of the Bribery Act 2010, no member of Rambert Grades' staff, consultants or advisers, nor of its Board of Directors, may offer or accept any gift, hospitality, benefit or other inducement which could be construed as being offered or accepted in the belief that some financial or other material advantage could be gained. This policy applies to Rambert Grades' operations worldwide.

Examples

This policy recognises that a breach can be perceived in many formats – the below list is indicative but not exhaustive:

Internal – involving people within the organisation examples include:

- Interception of payments to Rambert Grades
- Accepting financial incentives to award external contracts
- Making payments to anyone in order to obtain advantage
- Appointing a supplier to act on behalf of Rambert Grades who is believed to have engaged in corrupt or unlawful conduct
- Misuse of Rambert Grades credit cards
- Claiming false or inappropriate expenses
- Facilitating identity fraud

External – committed by people who are not directly involved with Rambert Grades examples include:

- False invoices
- False reports / Certificates
- Identity fraud
- Phishing
- Impersonation of Rambert Grades or appearing to represent the organisation
- "Hacking" electronic/online data or finance systems

Gifts and Hospitality

Staff, agents or other people associated with Rambert Grades should not accept gifts, hospitality or other form of benefit exceeding £40 in value either on their own behalf or on behalf of the Company, without informing and receiving clearance from the CEO or the Chair of the Board of Directors.

It is equally the case that no such gift or benefit in excess of £40 in value should be offered to any third party by persons associated with Rambert Grades without clearance from the CEO or the Chair of the Board of Directors.

Where permission has been given for the making of or acceptance of such a gift or benefit, a record will be made and kept by the CEO, identifying the date, the nature of the gift or benefit, its value, its donor and its recipient. Rambert Grade's Board of Directors will review the record once a year.

Bona fide promotional expenditure or hospitality undertaken to present services to, or establish or maintain good relations with, the RAD, other affiliates or other appropriate organisations (for example invitations to performances or other events) are not subject to the strictures of this policy.

Suppliers

New suppliers to Rambert Grades should be asked at the time of contracting to agree to this policy.

Assessment and Investigation

Rambert Grades aims to create a safe working environment where any employee can raise concerns internally without fear that their concerns will not be taken seriously and that they will be kept confidential. This is reflected in the Rambert Grades "Whistle Blowing Policy" which should be read in conjunction with this policy.

If an employee needs to raise a concern they should first do so to their line manager, this can be verbally or in writing and the line manager has a duty to investigate these concerns and escalate as appropriate.

If a concern is raised it will be fully assessed by a member of the Board of Directors and the CEO. The nature of the allegations will determine the extent that internal personnel are consulted and the extent to which external agencies and governing bodies are advised. In all cases the circumstances will be reported to the Board of Directors.

Any investigation will be conducted with confidentiality in mind. This will respect the confidentiality of both the investigators, sources and those directly and indirectly linked with the alleged concern.

The Directors' firm policy is not to tolerate fraud under any circumstances. Any issues will be treated with the utmost seriousness and the Directors will not

hesitate to implement the necessary disciplinary actions including dismissal, contract cessation and reporting to the necessary authorities.

Responsibilities

The Directors expect:

- The CEO and all members of the Senior Management Team to be vigilant and to raise issues and ensure that the necessary procedures adopted by the organisation, to prevent fraud, are implemented
- The Board of Directors, advised by the CEO to particularly focus of the potential for fraud during its risk review process
- All staff who have concerns to raise them to their line manager for appropriate escalation
- The CEO to lead on the design, periodic review and implementing of robust fraud protection measures. This is the subject of an internal document approved by the Directors
- The CEO to ensure there is a robust recruitment procedure including a self-declaration and a check on references
- The CEO to maintain confidential records of suspected and confirmed fraud

Outcomes

In the case of confirmed fraud, the Directors as advised by the CEO will:

- Report the Fraud as deemed appropriate
- Sanction the employee or supplier as appropriate
- Review fraud protection policy and procedures develop a relevant communication strategy
- Implement an assessment of the impact

The Bribery Act 2010 - Background information

The Bribery Act came into force on 1 July 2011. The Act is concerned with bribery which is generally defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

An organisation can be liable if a very senior person commits a bribery offence. It can also be held liable where someone performing services for the organisation offers a bribe to secure business. The Act says that no one can be prosecuted in England and Wales unless one of the two most senior prosecutors is personally satisfied that a conviction is more likely than not and in the public interest.

Organisations will not commit the offence of failing to prevent bribery if they have in place 'adequate procedures' to prevent bribery. What constitutes 'adequate'

will depend on the risk faced by the organisation. In summary, the Ministry of Justice states that organisations should follow six principles to help them decide whether or not they should change their practices:

1. Proportionality: action should be proportionate to the organisation's size and the risks it faces.
2. Top level commitment: those at the top of the organisation must show that bribery will not be tolerated and be involved in activity to prevent bribery.
3. Risk assessment: organisations should think about the risks they might face (see below).
4. Due diligence: proper checking of individuals and service providers ensures that the organisation knows who is working on its behalf.
5. Communication: staff should know about anti-bribery policies and might require training in this.
6. Monitoring and review: the steps taken should be kept under review to ensure that they are proportionate, appropriate and effective.

Risks

Thinking about this in relation to the Rambert Grades, generally the biggest risks are likely to be in two areas:

Procuring products and services: sourcing and engagement of external suppliers to undertake large projects. Rambert Grades currently has a limited number of external suppliers and these have been engaged through a tendering process, so this is a low risk. Ongoing review of suppliers to be undertaken at appropriate periods by the CEO and project managers.

Entering new markets: as Rambert Grades continues to expand it will enter markets where anti-bribery and anti-corruption legislation and culture is different to the UK. Rambert Grades maintains the process of this policy at all times and in all markets, and will ensure all staff and freelancers are aware of the requirements of this policy.

The risks relating to this policy will be reviewed on an annual basis to highlight future risks and reflect them as required in the overarching company risk register.

Version Number	1
Date Created	Nov 2023
Date Reviewed	Nov 2023
Next review date	June 2024