

## **Introduction**

McCue requires all staff at all times to act honestly and with integrity and to safeguard the resources of the Company.

Bribery and fraud are an ever-present threat to these resources and hence must be a concern to all members of staff. These may occur internally or externally and may be perpetrated by, for example, staff, consultants, suppliers or contractors, individually or in collusion with others.

The purpose of this document is to set out the responsibilities of staff with regard to bribery and fraud prevention, what to do if these are suspected and the action that will subsequently be taken.

## **Definitions of Bribery and Fraud**

The following are included in the definition of fraud: theft, false accounting, bribery and corruption, deception and collusion.

McCue does not permit, in accordance with the provisions of the Bribery Act 2010, the bribery of any person involved in its business. Employees must not authorise, offer, promise or pay or receive a bribe designed to secure an unlawful advantage. The amount of the bribe is irrelevant.

In addition to the existing common law offence of conspiracy to defraud, the Fraud Act 2006 provides for a general offence of fraud, identifying three ways in which it may be committed. These are:

- Fraud by false representation
- Fraud by failing to disclose information
- Fraud by abuse of position

## **Responsibilities**

Finance Procedures also state that the Company must:

- Ensure it has suitable policies and practices in place to safeguard itself against fraud and theft
- Ensure that it communicates its policy on fraud to staff in a formal policy statement

Irrespective of the amount involved, the Financial Procedures require all cases of suspected, attempted, or proven fraud to be reported immediately.

## **Staff Responsibilities**

All staff are responsible for:

- Acting with propriety in the use of the Company's resources and in the handling and use of funds, whether they are involved with cash or payment systems, receipts, or dealing with contractors, suppliers or customers
- Reporting details immediately to the Company Accountant if they suspect or believe that there is evidence of irregular or improper behaviour or that a fraud may have been committed.

### **Personal Conduct**

McCue Staff are required to report any potential conflict of interest to their line manager. Staff should not accept gifts, hospitality or benefits of any kind from a third party which might be seen to compromise their personal judgement and integrity. Further guidance on all aspects of personal conduct and the acceptance of gifts and hospitality is contained in Employment Contracts.

### **Managers' Responsibilities**

The day to day responsibility for the prevention and detection of fraud rests with line managers who are responsible for:

- Identifying the risks to which their systems, operations and procedures are exposed.

The on-line version is the only approved version of this document.  
Hard copies must be validated against the revision level of the on-line version

- Developing and maintaining effective controls to prevent and detect fraud
- Ensuring that controls are being complied with.
- Reporting details of suspected fraud immediately to the Company Accountant.

The Company has prepared a Fraud Response Plan, which acts as a guide in the event that fraud is suspected.

### **Disciplinary Action**

In the case of suspected or proven fraud of a serious nature, the Company reserves the right to refer the matter to the police at the earliest possible juncture. Notwithstanding this, and following appropriate preliminary investigation, the Company Accountant & Operations Director will jointly determine whether to invoke action in accordance with disciplinary procedures.

Signed:



Gary Purdy  
Managing Director

Date: January 2024