



FRAUD AND MALPRACTICE POLICY

This Policy has been assembled to protect Company operations, customers, shareholders and employees from the adverse effect of fraudulent behaviour.

The Company requires all staff at all times to act with honesty, integrity and to safeguard the resources for which they are responsible. Fraud and theft is an ever present threat to these resources and hence must be a concern to all members of staff.

Fraudulent and dishonest behaviour can result in substantial cost to the Company, loss of business and damage to our reputation.

This Policy applies to all employees, directors, contractors and consultants of Fredereck Sage & Co Limited.

Fraud is the deliberate action by a person; or allowing action to be taken by another; for the purpose of, or intention of;

- Obtaining money, assets or services
- Distorting business performance
- Causing loss to the Company, supplier or employee
- Accepting high value gifts or inappropriate hospitality
- Prejudicing the Company's competitive position or business reputation
- Money laundering
- Unauthorised release of confidential information
- Employment of illegal emigrants, those working under an assumed name or anyone unauthorised to work or carry on business in the UK.

All persons covered by this Policy have a role to play in preventing, detecting and reporting fraud.

You must:

- Carry out your duties in such a way as to prevent fraud
- Immediately report any suspicion of fraud to the Chairman or another Senior Manager

Following the Reporting of Suspected Fraud;

- Every reported incident of fraud will be investigated.
- The confidence of those reporting the incident or suspicion of fraud will be respected.
- The investigation will be carried out either internally by Managers, appointed by the Chairman, having no operational responsibility within the business unit implicated or externally by an appointed agency reporting to the Chairman.

In all cases the Chairman will take the decision as to whether the police or other authorities should be brought into the investigation.

For and on behalf of Fredereck Sage & Co Limited

A handwritten signature in black ink, appearing to read 'T. B. ...', is written over a horizontal line.

Senior Director

30.11.16

Date: