

Anti-Fraud, Bribery & Corruption Policy

The implementation of this Policy is mandatory to ensure that Bayanix management and workers have the knowledge, skills and competence to design, plan, manage or carry out work with due diligence to the protection of staff and others from fraud, bribery and corruption.

1.0 Introduction

Bayanix is committed to sound governance arrangements. In managing its arrangements and responsibilities the Company, is determined to ensure proper accountability and probity in delivering its stated business aims and objectives.

This Anti-Fraud, Bribery and Corruption Policy brings together existing key policy and procedure documents that are designed to: -

- help prevent fraud, bribery and corruption
- promote early detection and ensure its effective investigation
- where appropriate ensure the recovery of any financial loss.

2.0 Fraud, Bribery and Corruption

The term fraud encompasses a range of acts and can include:

- criminal deception
- forgery
- blackmail / bribery
- theft including the obtaining of a pecuniary advantage for a third party, i.e. financial gain or a reduction in a debt or liability
- the intentional changing of financial statements or other records by persons inside or outside the Company which is carried out to conceal the theft of assets or otherwise for gain
- conspiracy and the concealment of material facts.

Bribery is “the receiving or offering of undue reward to persons in order to influence their behaviour contrary to ordinary standards of integrity and honesty”.

Corruption can be defined as the “offering, giving, soliciting or acceptance of and inducement or reward, which may influence the action of any person.

Proper Standards

Employees have a duty to adhere to and comply with local Codes of Conduct.

The Company is committed to ensuring that employees receive suitable training and continuing professional development in order to assist them in the delivery of their duties.

3.0 Culture

The Company supports and promotes zero tolerance to any form of fraud, bribery, corruption or irregularity and will pursue perpetrators to the full extent of the law. It expects all members of the Company, to uphold the highest standards of integrity in their dealings for, and on behalf of, the Company.

4.0 Policies and Procedures

In order to promote a strong anti-fraud, bribery and corruption culture and infrastructure of preventative measures have been adopted in the form of policies and procedures that employees are required to comply with.

IMS-POL-005 Rev 1.1	Page 1 of 3	Process Owner Simone Eveson	
Issue Date	01/06/2018	Review Date	June 2019

Key policy and procedures include:

- Code of Conduct for employees
- Financial Procedures
- Human Resource policies including recruitment and disciplinary procedures

5.0 Reporting

The ethical framework above requires employees to report any concerns they may have regarding potential fraud, bribery or corruption.

The Company’s Whistleblowing (Confidential Reporting) Policy provides a route for raising concerns with the Company and detail the safeguards and support available.

Specific guidance is provided to employees relating to the requirement to report suspected cases of fraud, bribery or corruption and the initial actions they should undertake.

6.0 Investigation

Investigation into fraudulent, bribery or corrupt activity will normally be carried out by the Internal Audit Service who will liaise with Finance, and the Police where necessary.

Where there is evidence of suspected fraud, bribery or corruption, following discussion with Finance, Internal Audit will refer the matter to the Police who will determine if a criminal investigation is appropriate.

The Company will always seek to recover losses incurred as a result of any fraud, bribery or corruption.

7.0 Review

The Company will ensure that this policy and strategy document is subject to regular review to ensure its accuracy.

Company policies and procedures outlined within this document are also subject to regular review.

8.0 Sharing Information

The Company is committed to working with other agencies in the detection and prevention of fraud.

8.0 Contacts

Further advice or assistance can be obtained from the following: -

Bayanix Limited
 150 Minories
 London
 EC3N 1LS
 0207 871 1330

Info@bayanix.co.uk

IMS-POL-005 Rev 1.1	Page 2 of 3	Process Owner Simone Eveson	
Issue Date	01/06/2018	Review Date	June 2019

Policy Statement

The Company is committed to ensuring that quality services are developed and delivered for the benefit of all.

To assist in this goal the Company will take all necessary steps to ensure that the public's assets and interests are protected.

The Company will:

- promote a fair, equitable and honest approach to service delivery with those providing and receiving those services
- actively seek out instances of fraudulent and corrupt practices and pursue the perpetrators to the full extent of the law
- encourage people with concerns about potential fraud, bribery and corruption to inform the Company of their suspicions
- treat complaints of potential fraud, bribery and corruption positively, fairly and equitably
- regularly review its own procedures to ensure they offer effective protection of the Companies interests and reputation.

Delivery of these aims requires the establishment, communication and maintenance of:

- proper standards
- an anti-fraud cultures
- supporting policies and procedures
- reporting and investigation arrangements
- access to information and publicity
- review mechanisms
- data sharing arrangements



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IMS-POL-005 Rev 1.1	Page 3 of 3	Process Owner Simone Eveson	
Issue Date	01/06/2018	Review Date	June 2019