

City Gateway Anti-Fraud Policy

Introduction

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

Fraud is an ever-present threat to these resources and hence must be a concern to all members of staff. Fraud 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 fraud prevention, what to do if fraud is suspected and the action that will subsequently be taken.

Definitions of Fraud

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

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 Head of Finance if they suspect or believe that there is evidence of irregular or improper behaviour or that a fraud may have been committed.

Personal Conduct

City Gateway 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 and the Staff Handbook.

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
- 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 Head of Finance or if the Head of Finance is suspected to the CEO.

The CEO and Head of Finance are available to offer advice and assistance on control issues and managers are encouraged to make use of this service.

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 Head of Finance, and the CEO will jointly determine whether to invoke action in accordance with disciplinary procedures and report to the Finance Board Sub-Committee.

Signed:

A handwritten signature in black ink that reads 'D. DeBotts'.

Position: CEO

For: City Gateway

Date: Last revised on the 13/01/2021

Review Date: 14/01/2022