

## 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 are ever present threats 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 MadiganGill 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 Managing Director or another Senior Manager

Following the Reporting of Suspected Fraud;

- Every reported incident of fraud will be investigated.

## Service Provider of Choice

### MADIGANGILL LTD

Registered company number | 07037354 | Registered address | 10 Dominion Street, London, EC2M 2EF

| Unit F19, Pure offices, Kestrel Court, Harbour Rd, Portishead, Bristol BS20 7AN | Ground Floor C/O Regus 1000 Lakeside Western Road,

Portsmouth, Hampshire, PO6 3EZ | Office 1, Izabella House, 24-26 Regent Place, City Centre,

Birmingham B1 3NJ



- 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 Managing Director, having no operational responsibility within the business unit implicated or externally by an appointed agency reporting to the Managing Director.

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

Signed on behalf of the organisation :  Date : 1<sup>st</sup> January 2021

Signed by : Danny Madigan

Position : Managing Director

Next Review Date : 1<sup>st</sup> January 2022