

Anti-Fraud Policy

This document sets out the policy and procedures of GM Floor Screeds Ltd, against fraud and other forms of dishonesty. It applies to all staff anybody associated with GM Floor Screeds Ltd who commits fraud, theft, or any other dishonesty, or who becomes aware of it and does not report it, will be subject to appropriate disciplinary action. We will uphold all laws relevant to countering bribery, corruption, and fraud. We remain bound by laws of the UK, including the Bribery Act 2010 in respect of our conduct in the UK and abroad.

GM Floor Screeds will continually strive to ensure that all its financial and administrative processes are carried out and reported honestly, accurately, transparently, and accountability and that all decisions are taken objectively and free of personal interest. We will not condone any behaviour that falls short of these principles. All members of GM Floor Screeds Ltd have a responsibility for putting these principles into practice and for reporting any breaches they discover.

Definitions

- Fraud - A deliberate intent to acquire money or goods dishonestly through the falsification of records or documents. The deliberate changing of financial statements or other records by anyone who works for the company. The criminal act is the attempt to deceive, and attempted fraud is therefore treated as seriously as accomplished fraud.
- Theft - Dishonestly acquiring, using, or disposing of physical or intellectual property belonging to GM Floor Screeds Ltd or to individual members of the company.
- Misuse of equipment - Deliberately misusing materials or equipment for financial or material benefit.
- Abuse of position - Exploiting a position of trust within the company for financial or material benefit.

GM Floor Screeds Ltd fosters honesty and integrity in its entire staff. The Director and staff are expected to lead by example in adhering to policies, procedures, and practices. Equally, members of the public, service users and external organisations (such as suppliers and contractors) are expected to act with integrity and without intent to commit fraud against the Company. As part of this, GM Floor Screeds Ltd will provide clear routes about which concerns may be raised by the Directors, Manager, and staff. Details of this can be found in the Staff Handbook. Senior Management are expected to deal promptly, firmly, and fairly with suspicions and allegations of fraud or corrupt practice.

In relation to the prevention of fraud, theft, misuse of equipment and abuse of position, specific responsibilities are as follows:



The Directors are responsible for establishing and maintaining a sound system of internal control that supports the achievement of the Charity's policies, aims and objectives. The system of internal control is designed to respond to and manage the whole range of risks which the Charity faces. The system of internal control is based on an on-going process designed to identify the principal risks, to evaluate the nature and extent of those risks and to manage them effectively. Managing fraud risk is seen in the context of the management of this wider range of risks. Overall responsibility for managing the risk of fraud has been delegated to the Director. The day-to-day responsibility has been delegated to the Accounts Manager. Their responsibilities include: Undertaking a regular review of the fraud risks associated with each of the key organisational objectives. Establishing an effective anti-fraud response plan, in proportion to the level of fraud risk identified. The design of an effective control environment to prevent fraud.

Establishing appropriate mechanisms for reporting fraud risk issues and reporting significant incidents of fraud or attempted fraud to the Director. Liaising with the Companies appointed Auditors. Making sure that all staff are aware of the Charity's Anti-Fraud Policy and know what their responsibilities are in relation to combating fraud. Ensuring that appropriate action is taken to minimise the risk of previous frauds occurring in future.

The Senior Management Team are responsible for ensuring that an adequate system of internal control exists within their areas of responsibility and that controls operate effectively. Preventing and detecting fraud as far as possible and assessing the types of risk involved in the operations for which they are responsible. Then reviewing the control systems for which they are responsible regularly.

Every member of staff is responsible for and should ensure that controls are being complied with and their systems continue to operate effectively with implementing new controls to reduce the risk of similar fraud occurring where frauds have taken place. Acting with propriety in the use of GM Floor Screeds Ltd resources and the handling and use of funds whether they are involved with materials, equipment, cash, receipts, payments or dealing with suppliers. Conducting themselves with selflessness, integrity, objectivity, accountability, openness, honesty, and leadership. Being alert to the possibility that unusual events or transactions could be indicators of fraud. Alerting their manager when they believe the opportunity for fraud exists e.g. because of poor procedures or lack of effective oversight. Reporting details immediately if they suspect that a fraud has been committed or see any suspicious acts or events; and cooperating fully with whoever is conducting internal checks or reviews or fraud. investigations.

GM Floor Screeds Ltd

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