



Anti-Fraud & Bribery Policy

General

This document details Cava Security Services Limited policy towards detected or suspected acts of fraud, bribery, or other irregularity, whether relating to employees, Directors and / or, consumers, customers, stakeholders, suppliers, contractors, sub-contractors, partners or any other related third party.

Also referenced and subject to this policy is the Induction and Training Form 4 Statement of Value & Business Ethics and within this handbook reference Gifts & Hospitality.

All staff should make themselves aware of this policy and its consequences, in order that they conduct themselves in an appropriate manner. Staff must ensure that they have read, understood, and comply with the policy. This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

Your Responsibility

The prevention, detection and reporting of bribery and other forms of corruption is the responsibility of all those working for the Cava Security Services Limited or under its control.

All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Staff must notify the Managing Director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

Any member of staff that breaches this policy will face disciplinary action, which could result in suspension, dismissal, or exclusion for gross misconduct under the handbooks disciplinary procedure, Cava Security Services Limited may also contact the Police and in doing so reserve the right to terminate the contractual relationship with staff if they breach this policy.

Values

Three fundamental values underpin the Cava Security Services Limited activities and these are:

a) **Accountability**

Everything done by those who work in the College must be able to withstand

comprehensive scrutiny.

b) Probity

Absolute honesty and integrity should be exercised in dealing with customers, consumers, directors, staff, stakeholders, assets and third parties.

c) Openness

Cava Security Services Limited activities should be sufficiently open and transparent to promote confidence between Cava Security Services Limited and customers, consumers,

Directors, staff, stakeholders, assets and third parties. All employees, executive directors should be aware of, and act in accordance with, these values.

In accordance with these values, the Company is committed to maintaining an honest, open and well-intentioned atmosphere within its working environment. It is, therefore, also committed to the prevention and elimination of wrong doing within its sphere of operation and to the rigorous investigation, and taking of any action required. This could include the instigation of the Disciplinary, Suspension & Dismissal Procedure and where such action is necessary, this will be taken against an individual regardless of seniority. The Company will not tolerate any form of fraud, any act of bribery or any other form of irregularity in either the United Kingdom or overseas, should the Company operate outside the boundaries of the United Kingdom. The Company wishes to encourage anyone having reasonable suspicions of suspected or actual fraud, malpractice, abuse, or act of bribery to report them to their Managing Director. It is the Companies policy, which will be rigorously enforced, that no employee should suffer as a result of reporting reasonably held suspicions. For the purposes of this policy "reasonably held suspicions" shall mean any suspicions other than those which are groundless and / or raised maliciously.

Responsibilities

The primary responsibility for prevention and detection of fraud rests with those charged with managing responsibilities directly linked to:

- a) Developing and maintaining effective, efficient and visible procedures and controls to prevent and minimise the risk of fraud and bribery e.g. Scheme of Financial Management and Control, Staff Handbook.
- b) Producing a clearly defined and publicised Anti-Fraud & Bribery Policy (i.e. this document) which applies to everyone in, or involved with, the Company and encourages open reporting of concerns.
- c) Ensuring that all staff, Directors and External Members of the Governing Body are aware of their duties and the required standards of conduct.
- d) Ensuring that all relationships with third parties (consumers, stakeholders, suppliers, contractors, sub-contractors, partners or any other related third party) are
Conducted on a basis that is compliant with the provisions of the Bribery Act 2010.
- e) Protecting and supporting against harassment or victimisation, those who, in good faith, make allegations of suspected irregularities.
- f) Safeguarding the rights of any persons subject to investigation.

- g) Carrying out vigorous and prompt investigations if suspicion of an act of fraud, bribery or other irregularity arises.
- h) Taking or instigating appropriate legal and / or disciplinary action against perpetrators of fraud or bribery and taking disciplinary action against supervisors / managers where supervisory failures have contributed to the breach.
- i) Reporting the outcome of any such investigations to the appropriate officers and authorities. Terms of Reference in relation to fraud are strictly adhered to and that requirements under the Joint Audit Code of Practice (JACOP) are followed should such a situation arise.

The Companies External Auditors are responsible for obtaining reasonable assurance that the Financial Statements are free from material misstatement caused by fraud.

Two types of fraudulent misstatement are relevant to auditors i.e., fraudulent financial reporting and misappropriation of assets.

The Compliance Director is responsible for:

- a) Identifying the risks within systems and procedures.
- b) Developing and maintaining effective controls to prevent and detect fraud or acts of bribery.
- c) Ensuring that policies and controls are regularly reviewed, updated, and complied with ISO 9001:2017 and annually as part of the Approved Contractor Scheme audited by the Security Industry Authority.

Employees are responsible for acting with propriety in all Company activities and this includes:

- a) The handling and use of any funds, monies, stock or any other consumables or assets (including scrap), that have a value.
- b) Dealings with customers, Director, Stakeholders, contractors or suppliers, sub-contractors or partners or any other aspect of Companies business.
- c) Ensuring that they do not request, accept, or agree to receive, gifts, hospitality or benefits of any kind from any third party which might be seen to compromise their personal judgement or integrity or infringe the Bribery Act 2010.
Employees should refer to the Companies Gifts & Hospitality referenced in the Hand Book.
- d) Ensuring that they do not offer, promise or give any form of bribe to obtain or retain business with the exception of the Sales Director offering a thank you voucher for business already obtained or entertaining clients during the servicing of a contract without the need to compromise this policy.
- e) Communicating their concerns as appropriate.
- f) Adhering to all relevant Company policies regarding confidentiality (as included in the Companies Staff Handbook) and any other relevant regulations, protocols and procedures regarding their behaviour and conduct.
- g) Ensuring that claims for personal expenses are compiled with integrity.
- h) Co-operating fully with any investigation covered by this policy, whether conducted by the Companies managers, Internal Auditors, the Police or other Authority.

The Company reserves the right to prosecute those suspected of acts of fraud or bribery.

Definitions

What is Fraud?

Fraud is defined in the Fraud Act 2006 and includes fraud by false representation, fraud by failing to disclose information and fraud by abuse of position, as detailed below.

Fraud by false representation

A person commits fraud by false representation if they:

Dishonestly make a false representation with intention:

- a) To make a gain for himself or another, or
- b) To cause loss to another or to expose another to a risk of loss.

A representation is false if:

- a) It is untrue or misleading, and
- b) The person making it knows that it is, or might be, untrue or misleading.

A representation may be expressed or implied.

A representation may be regarded as made if it is submitted in any form to any system or device designed to receive, convey, or respond to communications. This will include any form of electronic communication or social media.

Fraud by failing to disclose information.

A person commits fraud by failing to disclose information if they:

Dishonestly fail to disclose to another person information which they are under a legal duty to disclose, and intend, by failing to disclose the information:

- a) To make a gain, either for himself or for another, or
- b) To cause loss to another or to expose another to a risk of loss.

Fraud by abuse of position

A person commits fraud by abuse of position if they:

Occupy a position in which they are expected to safeguard, or not to act against, the financial interests of another person, and

Dishonestly abuse that position, and

Intend, by means of the abuse of that position to

- a) Make a gain for himself or another, or
- b) Cause loss to another or to expose another to a risk of loss.

A person may be regarded as having abused their position either through an omission or by a specific act.

A 'gain' means a gain in money or other property, either temporary or permanent, and

can include 'keeping what one has', as well as 'getting what one does not have'.

Obtaining services dishonestly

Under the Fraud Act 2006, a person may be found guilty of obtaining services dishonestly if they are aware that payment is due for the services received by them and they either intend not to pay or do not pay in full for the services or do not pay for them at all.

A fraud may involve one or several people, from either within and / or external to the Company, in collusion with each other.

What is Bribery?

The Bribery Act 2010 defines four key offences of bribery:

- a) A general offence of offering, promising or giving a bribe.
- b) A general offence of requesting, agreeing to receive, or accepting a bribe.
- c) A distinct offence of bribing a foreign public official to obtain and / or retain business.
- d) Failure of a corporate body to prevent bribery by an associated person, for the organisation's benefit.

Generally, a bribe is defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

The consequences for breaches of the Bribery Act 2010 are serious and include unlimited fines and the prevention of bidding for a government contract for the Company and for an individual, it could mean imprisonment.

The Company, as a commercial organisation, also has in place a number of "adequate procedures" to prevent bribery, and these include:

- a) Proportionality.
- b) Top level commitment.
- c) Risk Assessment.
- d) Due Diligence.
- e) Communication (including training).
- f) Monitoring and Review.

More information in relation to above are detailed in the guidance document.

<https://www.gov.uk/government/publications/bribery-act-2010-guidance>

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Position: Compliance Director

Date: 13/07/2021

Signed: *Mal Ullah*