

## OBJECTIVE

To provide standards to be implemented which are designed to deter, prevent, detect, investigate and report fraud.

## DEFINITIONS

- External fraud, where the act of deception is committed by a client contact, a delegate or an unrelated party.
- Internal fraud, where the act of deception is committed directly, indirectly and/or collusively with third parties by a member of Spring CCR Ltd. A member includes Directors, Associates and Contractors.

## PRINCIPLES

Spring CCR Ltd. has a duty to comply with prevailing legal and regulatory requirements. In the United Kingdom these are included in:

Fraud Act 2006 (excluding Scotland); Theft Act 1968 (excluding Scotland);  
Common law offences of Fraud in Scotland; Proceeds of Crime Act 2002;  
Serious Organised Crime and Police Act 2005

The Company demands high moral and ethical standards in all business activities.

## THE PURPOSE

To reduce the impact of any fraud and colleague dishonesty and thereby:

- Minimise adverse impact of fraud on customer relationships.
- Enhance the Company's reputation as a reputable and honest organisation.
- Protect the assets and reputation of the Company's Clients.

## PROCESS

Representatives must:

1. Adhere to the relevant legal and regulatory requirements.
2. Not engage in any illegal, improper or questionable activity that breaches this Fraud policy or the Fraud Policy of Clients.
3. Be aware of the possibility of acts of deception that may damage the Company or its Clients.
4. Immediately report to a Company Director any discovered or suspected fraudulent activity whether it is 'internal' or 'external' and make a secure and confidential written report.

The Company Director must:

5. Immediately investigate the report and take the necessary steps to detect, deter, mitigate or prevent the fraud .
6. Report to the appropriate authority without delay including Client if appropriate.
7. Generate a documented Fraud Incident Report and retain it securely for ten years.
8. Make reports available to relevant authorities who request it.

## TRAINING, AWARENESS AND MONITORING

At least annually or at induction the Company must:

1. Clearly explain to personnel acting on behalf of the Company their personal responsibilities in relation to preventing fraud.



## **SPRING FRAUD POLICY**

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2. Ensure understanding of the nature of Fraud (see definitions).
3. Be capable of accessing the relevant legal Acts (see above) for training purposes.
4. Add Fraud Awareness to the Agenda of a Company Meeting with all Representatives present for to ensure all personnel know how to be aware of fraud (detect) and what action to take (see above).

On a regular basis the Company must:

5. Raise the subject of Fraud with individuals working with the Company to ascertain the proper conduct of all relationships and absence of dishonesty or otherwise.
6. Maintain records and provide access to them if required by a person with good reason.

### **ASSOCIATE (sub-contractor) RECRUITMENT AND VETTING**

The Company must conduct the following checks for each of its Representatives and retain the information securely:

Name Address and Telephone Numbers

Passport

Curriculum Vitae and References (personal and professional)

