

Fraud Prevention and Anti-Bribery and Corruption Policy

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Related Policies:	Whistleblowing Policy, Gifts and Hospitality Policy

Introduction

Enterprise Cheshire and Warrington (ECW) and Marketing Cheshire (MC) are committed to operating a framework for the prevention and detection of fraud, bribery and corruption and for a robust process to be followed in the event that fraud, act of bribery or corruption is suspected.

Commitments

ECW and MC:

- Will uphold all UK legislation relevant to countering fraud, bribery and corruption, including the Fraud Act 2006 and the Bribery Act 2010.
- Require board members, employees and persons working on our behalf to act with honesty, integrity and due care in all matters adhering to the Nolan Principles, to safeguard the company, its assets, and its reputation.
- Strictly prohibit and will not tolerate fraud, acts of bribery and any other forms of corrupt behaviour.
- Understand and regularly assess the nature and extent of risks relating to fraud, bribery and corruption.
- Ensure appropriate due diligence that those it does business with share the culture of intolerance to fraud, bribery and corruption.
- Maintain and clearly communicate their expectations through a Code of Conduct, Register of Interests, and, for employees, the Staff Handbook.
- Dedicate sufficient resources to implement and embed procedures to provide anti-fraud, bribery and corruption training.
- Ensure that practical, cost-effective controls and procedures are implemented to proactively identify fraud, acts of bribery and corruption.
- Remain alert to the risk of fraud, bribery and other irregularities both within the organisation and in the organisations with which the company contracts and reports any matters of potential concern.
- Recognise that signs of fraud, bribery and corruption in the organisation and/or its supply chain could be an indication of other illegal or unethical activity.
- Promote an open, honest and questioning culture which encourages propriety and vigilance amongst all personnel.
- Implement a process that encourages all personnel to raise any matter of genuine concern, including operating a Whistleblowing Policy.
- Take any allegation of suspected or actual fraud seriously advising the s151 Officer of any such reports and actions being taken, which may ultimately lead to dismissal via ECW's disciplinary policy or, for non-employees, potential removal from contracts and/or be subject to the involvement of the Police and judicial system in the event of any criminal activity.
- Reserves the right to recover losses associated with the breach of this policy.
- Periodically monitors this policy and its associated procedures.