

Anti-Fraud Strategy

The key elements

Top level tone and buy in:

Senior executive responsible for advocating and implementing an anti-fraud and corruption strategy and culture, with the full support of the senior management

A robust and **detailed risk assessment** of the group and its operations:

- To include due diligence on third parties
- Refine/develop anti-corruption procedures on the basis of assessment

A high level statement of **general anti-corruption principles** and best practice

Detailed policies on anti-corruption procedures tailored to the risk profile of business area to include:

- corporate hospitality;
- gifts and entertainments policy

Continuous training programmes for existing and new employees

Embedding of procedures in automated work-flow processes

Systems and Measures

Systems

1. Implement system to enable and encourage "whistleblowing" on a confidential basis
2. Implement accounting software which automatically highlights suspect transactions and regular audit of payments to 3rd parties
3. Systems to incentivise compliance over other business incentives
4. Conduct anti-corruption due diligence on acquisitions and third parties you are engaged with
5. Robust and independent Internal Audit and/or Investigations department

Measures

1. Encourage an open culture
2. Move employees around roles; change approval hierarchy to avoid specific individuals holding too much power
3. Clear and accountable decision making structures (e.g. well defined procurement processes for major supply contracts)
4. Clear rules re. disclosure of connected parties and financial incentives
5. Create systems which reduce the potential for fraud; for example:
 - Avoid employees paying for travel expenses
 - Require tenders to be publicised well in advance of deadlines