

GROUP FRAUD POLICY

2nd EDITION

The Crescent Group (CSE) is committed to preventing fraud and corruption from occurring and to developing an anti-fraud culture. To achieve this CSE will comply with the requirements of Government Accounting to:

- Develop and maintain effective controls to prevent fraud;
- Ensure that if fraud occurs a vigorous and prompt investigation takes place;
- Take appropriate disciplinary and legal action in all cases, where justified;
- Review systems and procedures to prevent similar frauds;
- Investigate whether there has been a failure in supervision and take appropriate disciplinary action where supervisory failures occurred; and
- Record and report all discovered cases of fraud.

The following policies and principles apply in the CSE.

- CSE staff must have, and be seen to have, the highest standards of honesty, propriety and integrity in the exercise of their duties.
- CSE will not tolerate fraud, impropriety or dishonesty and will investigate all instances of suspected fraud, impropriety, or dishonest conduct by CSE staff or external organisations (contractor or client).
- CSE staff must not defraud CSE, other CSE staff, CSE clients or CSE contractors, in any way.
- CSE will take action – including dismissal and/or criminal prosecution - against any member of staff defrauding (or attempting to defraud) CSE, other CSE staff, CSE clients or contractors.
- CSE will take action - including criminal prosecution - against external organisations defrauding (or attempting to defraud) CSE, CSE staff in the course of their work, CSE clients or contractors.
- The CSE will co-operate fully with an external investigating body.
- The CSE will always seek to recover funds lost through fraud.
- All frauds will be reported to Internal Audit.

A handwritten signature in blue ink, appearing to read "Chris Aylward".

Chris Aylward

Group Chief Executive

December 2021