

Fraud policy

Policy Statement

This document sets out Campbell & Kennedy's policy on fraud. For practical purposes fraud may be defined as the use of any deception with the intention of obtaining an advantage, avoiding an obligation or, causing any loss to Sky, its employees or its shareholders.

This means that any person who intentionally uses any lie or trick to obtain any benefit for themselves or another person has committed a fraud.

Eligibility

This policy will be applied to all instances of fraud and must be followed by all employees of C&K.

Conditions and Rules

- C&K does not tolerate Fraud under any circumstances;
- Managers have a responsibility to design, implement and operate processes and controls designed to prevent and detect Fraud;
- Employees are responsible for operating processes and controls implemented by management within their area of responsibility to safeguard the assets of the company;
- All employees have a responsibility to report all instances of Fraud or suspected Fraud to their Manager
- The Head Finance Officer is responsible for reporting all instances of Fraud committed by employees with a significant role in the company's internal controls over financial reporting to the MD;
- All instances of Fraud will be fully investigated by the MD;
- C&K will seek to recover all losses suffered as a result of Fraud, whether suffered by the company, its shareholders, employees or other stakeholders;
- C&K will seek to impose robust sanctions against those found to have been involved in fraudulent activity against C&K. This may include disciplinary proceedings, civil court action and/or criminal prosecution.

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