



# FRAUD AND MALPRACTICE POLICY

## Section 1: Purpose

The purpose of this policy is to define the measures taken to ensure Fraud and Malpractice does not become an issue within the company.

## Section 2: Scope

This document applies throughout USSL on all contracts carrying out all services.

## Section 3: Introduction

As outlined the business management system, it is policy of USSL to conduct our business in a professional, lawful and ethical manner. Therefore, it is a general rule that any employee found to be engaging in fraud or malpractice against USSL or our business partners in the course of their normal duties will be dismissed.

### Section 4: Guidance

Fraud may involve the following:

- Theft of company assets
- Forgery or alteration of company documents
- Destruction or removal of company records
- Falsification or omission of transactions from company records
- Falsification of expense claims
- Disclosure of confidential information without authority
- Use of company assets for personal use, unless explicitly authorized in advance

Malpractice may involve non-compliance with the statements outlined in this code of conduct and with other policies and procedures in issue.

It is the responsibility of each employee to report upon suspected occurrences of fraud or malpractice. Such reports can be made the Managing Director who will undertake an investigation into any allegations made. You can leave details of your suspicions, anonymously if you so wish, although by leaving contact information, it will enable subsequent investigations to be carried out more effectively. Alternatively, employees may speak to their immediate superior or other member of Senior Management. All reports will be taken seriously and will be treated in the strictest of confidence. Matters will be investigated where appropriate, and disciplinary and/or legal action will be taken against any employee found to be guilty of committing fraud or malpractice.

Effective internal controls help to prevent fraud and malpractice by ensuring that policies and procedures are complied with, that transactions are recorded promptly and accurately, that assets are safeguarded and that accurate management information is available for review on a timely basis.

#### Section 5: Control

The control of Fraud and Malpractice will be controlled in the following manner.

- All suspicions of fraud and malpractice will be investigated by the senior management team
- Spot checks of employee's belongings will be undertaken (With Prior Notice) if theft of company's assets is suspected
- Any persons suspected of Fraud or Malpractice will be immediately suspended from front line operations so as to minimize company
  risk
- Where necessary the police will be called in to investigate serious cases

### Section 4 Document History

October 2016 New Document February 2019 New Branding