

04 Anti-fraud and Corruption Policy

Version 2 | October 2021

HCV Network Ltd. is committed to a zero-tolerance approach to fraud and corruption in its activities and operations, both within the organisation and in the implementation of projects. HCV Network Ltd. staff must always act honestly and with integrity and safeguard the resources for which they are responsible.

1. Our commitments

- HCV Network Ltd. is opposed to any form of bribery or inducement. Therefore, staff may not offer to or accept from any third party any benefit whether financial or in kind, other than proper remuneration to or from HCV Network Ltd.
- Clear statements on a zero-tolerance to corruption will be included in HCV Network Ltd. Terms of Employment for staff and Terms and Conditions for sub-contractors.
- All employees will receive information and appropriate training on the zero-tolerance approach via the induction process and regular review of this policy. If the need arises specialist training may also be provided for certain employees.
- HCV Network Ltd. will always support staff who highlight concerns about possible cases of fraud.

2. Responsibilities

The Directors are responsible for ensuring that an adequate system of internal control is developed and used within the organisation, including:

- Developing and maintaining effective policies and procedures to help prevent or detect fraud.
- Carrying out thorough and prompt investigations if fraud occurs.
- Taking disciplinary action against staff where their actions or lack of action have contributed to the commission of the fraud.

- Reporting all fraud or attempted fraud where the monetary loss is in excess of £1,000 or where there is a risk to HCV Network Ltd.'s reputation.

The **Executive Director** is responsible for ensuring that the system of internal control is operating effectively within their areas of responsibility including:

- Ensuring policies and procedures to prevent and detect fraud are being followed.
- Informing the Directors and the finance manager promptly of any concerns related to fraud or corruption.
- Informing group Directors and the finance manager of any concerns about the internal control system.

Every member of staff is responsible for implementing the policy and procedures including:

- Alerting their line manager or a Director where they feel the opportunity for fraud exists because of poor procedures or lack of effective supervision;
- Reporting details of (a) any suspected or actual fraud, or (b) any suspicious acts, to their line manager or country/regional director or, if they prefer, to the group finance manager.
- Assisting in any investigations by making available all relevant information and by cooperating in interviews.

Note that HCV Network Ltd. is committed to supporting staff that raise issues (sometimes referred to as 'whistle-blowers') by taking action which resolves the issue while minimising any risk to the staff concerned.

The **Finance Manager**:

- Should be informed if fraud is suspected or discovered.
- Is responsible for investigating actual or suspected fraud and reporting to the Directors,
- Will undertake a review of systems of control once any investigation has been completed and is available to offer advice and assistance on risk and control issues.

3. Review of this policy

This procedure will be kept under regular review to ensure its effectiveness.