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FRAUD & MALPRACTICE POLICY

Background

Bluestone has a commitment to high legal, ethical and moral standards. All employees and operatives are expected to share this commitment. This policy is established to facilitate the development of procedures which will assist in the investigation of fraud and any related offences.

Bluestone have procedures in place that reduce the likelihood of fraud occurring. These include documented procedures and systems of internal control and risk assessment management.

This Policy is intended to provide direction and help to employees, operatives and directors who find themselves having to deal with suspected cases of theft, fraud or corruption. This Policy gives a framework for a response, advice and information on various aspects and implications of an investigation and provide direction on prevention of fraud.

Fraud Policy

This policy applies to any irregularity, or suspected irregularity, involving employees as well as contractors and any other parties with a business relationship with Bluestone. Any investigative activity required will be conducted without regard to any person's relationship to Bluestone, position or length of service.

Fraud and malpractice comprises both the use of deception to obtain an unjust or illegal financial advantage and intentional misrepresentations affecting any aspect of company activity by one or more individuals among management, staff or third parties.

All managers and staff have a duty to familiarise themselves with the types of improprieties that might be expected to occur within their areas of responsibility and to be alert for any indications or irregularity.

Bluestone's Policy

The directors are committed to maintaining an honest, open and well-intentioned atmosphere within the company. They are also committed to the elimination of any fraud and/or malpractice.

The directors encourage anyone having reasonable suspicions of fraud or malpractice to report them and that employee/sub-contractor will suffer in any way as a result of reporting reasonably held suspicions.

All employees/sub-contractors can be confident that they will not suffer in any way as a result of reporting reasonably held suspicions of fraud or malpractice. For these purposes reasonably held 'suspicions' shall mean any suspicions other than those, which are raised maliciously and found to be groundless. Bluestone will deal with all occurrences in accordance with the Public Interest Disclosure Act 1998.

The following paragraphs summarise the actions to be taken following the discovery of fraud and malpractice or suspected fraud or malpractice.

Purpose of the Fraud & Malpractice Plan

The purpose of this plan is to ensure that timely and effective action is taken in the event of fraud and/or malpractice.

The plan acts and increases the chances of a successful investigation. The plan sets out authority levels, responsibilities for action, and reporting in the event of a suspected fraud or malpractice. The plan acts as a checklist of actions and a guide to follow in the event of fraud and/or malpractice being suspected. The plan is designed to enable Bluestone to –

- prevent further loss
- establish and secure evidence necessary for disciplinary and/or criminal action
- notify the directors immediately
- assign responsibility for investigating the incident
- minimise and recover losses
- review the reasons for the incident, the measures taken to prevent a recurrence, and determine any action needed to strengthen future responses to fraud or malpractice
- keep all who need to know suitably informed about the incident
- help promote an anti-fraud culture by making it clear to everyone that Bluestone will pursue all cases of fraud or malpractice vigorously taking appropriate action in all cases where justified.

Action following detection

When anyone suspects fraud has occurred, they must notify any manager immediately. Prompt action is essence and the initial report should be verbal and must be followed up within 24 hours by a written report addressed to the directors which should cover –

- The amount/value if known
- The position regarding recovery or company exposure
- The period over which the irregularity occurred if known
- The date of discovery and how the suspected fraud and/or malpractice was discovered
- The type of irregularity and what led to it - a breakdown in the systems/inherent weakness
- Has the person responsible been identified
- Is any collusion with others suspected
- Details of any actions taken to date
- Any other information or comments which might be useful

Consultation

On verbal notification of a possible fraud, the manager should speak with the directors immediately. The directors will decide if there is evidence of fraud whether the police should be notified immediately. The written report should be provided to the directors.

Initial enquiries

Before completing the report, it may be necessary for management to investigate to ascertain the facts. This investigation should be carried out as quickly as possible. The purpose of this is to confirm or repudiate suspicion.

Duty of care

The manager conducting the initial enquiry must be conscious that disciplinary action and/or criminal prosecution may result. The employee/sub-contractor concerned has a right to representation and may have the right to remain silent. Utmost care is required conducting enquiries and interviews.

In addition, to protect Bluestone from further loss potential destruction of evidence, it may be necessary to suspend the employee/sub-contractor concerned immediately the allegation has been made or following the submission of the manager's initial verbal report.

Protection of evidence

If the initial examination confirms the suspicion that a fraud or malpractice has been perpetrated, then to prevent the loss of evidence which may subsequently prove essential for disciplinary action or prosecution, management should –

- take steps to ensure that all original evidence is secured as soon as possible
- account for the security of the evidence at all times after it has been secured, including keeping a record of its movement and signatures of all persons to whom the evidence has been transferred

- not alter or amend the evidence
- record when you came into possession of the evidence
- all evidence relating to the investigation must be disclosed in the event of formal proceedings

Police involvement

If the directors are satisfied there is evidence of fraud, then they must report the matter to the police. The police will decide if an investigation is appropriate.

Learning from experience

Following completion of the case, management to take the appropriate action to improve procedures to mitigate any future recurrence of the fraud and/or malpractice.

Policy review

This policy to be reviewed annually.



Richard Lee Molyneux



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