

Quack Recruitment & Training COUNTER FRAUD POLICY

The statement sets down Quack Recruitment & Training Ltd commitment to preventing Bribery and Corruption in our business activities and the steps we have put in place with the aim of ensuring that there is no bribery or corruption in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of Quack Recruitment & Training Ltd which are as follows:

The Company currently operates in the following countries:

United Kingdom territories.

Policy Statement: Quack Recruitment & Training Ltd is committed to preventing, detecting, and addressing fraud in all aspects of our business operations. We have zero tolerance for any form of fraud, including but not limited to, theft, embezzlement, misappropriation of assets, falsification of records, corruption, bribery, kickbacks, collusion, and other fraudulent activities. We are committed to maintaining a strong internal control environment and promoting a culture of honesty, integrity, and accountability among our employees, contractors, and stakeholders.

Compliance with Laws: Quack Recruitment & Training Ltd will comply with all applicable laws, regulations, and industry standards related to fraud prevention and detection.

This includes but is not limited to, relevant fraud-related laws and regulations in the jurisdictions where we operate, such as the Fraud Act 2006 in the UK, and other applicable laws related to financial and accounting practices.

Fraud Prevention Measures: Quack Recruitment & Training Ltd will implement robust fraud prevention measures, including but not limited to, the following:

- a. **Segregation of Duties:** We will ensure that appropriate segregation of duties is maintained in all key financial and operational processes to prevent any single individual from having excessive control or authority over financial transactions.
- b. **Internal Controls:** We will establish and maintain effective internal controls to ensure that all financial transactions are authorized, recorded, and reported accurately and timely, and that assets are safeguarded against fraud and misappropriation.
- c. **Risk Assessment:** We will conduct regular risk assessments to identify and assess potential fraud risks in our business operations and implement appropriate controls and mitigation measures to minimize these risks.
- d. **Code of Conduct:** We will have a comprehensive code of conduct that sets clear expectations for our employees, contractors, and stakeholders regarding their conduct and ethical responsibilities, including the prohibition of fraud and other fraudulent activities.
- e. **Employee Screening:** We will conduct thorough background checks and screening of all employees and contractors who have access to financial transactions or sensitive information to mitigate the risk of insider fraud.



Head Office:

Quack Recruitment Ltd,
The Business & Technology Centre Bessemer
Drive
Stevenage Herts
SG1 2DX

Regional Office:

Quack Recruitment Ltd,
27-31 Lichfield Street
Walsall
WS1 1TE

f. Whistleblowing: We will provide a confidential and accessible whistleblowing mechanism for employees, contractors, and stakeholders to report any suspected fraud or fraudulent activities, and we will take appropriate actions to investigate and address such reports in a timely and confidential manner.

Fraud Detection and Investigation: Quack Recruitment & Training Ltd will implement measures to detect and investigate suspected fraudulent activities, including but not limited to:

a. Monitoring and Data Analysis: We will use data analytics and other monitoring techniques to identify potential fraud indicators, such as unusual patterns or trends in financial transactions, discrepancies in records, or other anomalies.

b. Internal Audits: We will conduct regular internal audits of our financial and operational processes to assess compliance with internal controls and detect any potential fraud or irregularities.

c. Investigation and Reporting: We will investigate all reported cases of suspected fraud promptly and thoroughly, and we will take appropriate actions to address confirmed fraud cases, including reporting to relevant authorities, recovering assets, and implementing corrective measures to prevent future occurrences.

Employee Responsibilities: All employees and contractors of Quack Recruitment & Training Ltd are responsible for preventing and detecting fraud in their respective roles. This includes but is not limited to:

a. Compliance with Policies and Procedures: Employees and contractors must

comply with all relevant policies, procedures, and internal controls related to fraud prevention and detection, including but not limited to the code of conduct, financial policies, and internal control measures.

b. Reporting Suspected Fraud: Employees and contractors must report any suspected fraud or fraudulent activities promptly through the established reporting

channels, including the confidential whistleblowing mechanism, and cooperate in any investigations related to fraud.

c. Ethical Conduct: Employees and contractors must maintain high standards of ethical conduct in their business activities and avoid any behaviour that may constitute.