



APPENDIX G

Crime and Malpractice Policy Statement

Recruitment

Consider references, criminal record, reason for leaving previous employment, any indicators of personal circumstances such as debt, stress that could indicate a vulnerability to financial crime. Consider existing friendships and contacts with other employees.

Induction

Whistle blowing policies clarifying the need to report suspicious activities and assuring staff that they will be supported and protected from any victimisation resulting from reporting corruption instances of malpractice that while not necessary illegal are detrimental to the reputation of the company, for example ethical issues such as exploitation of low pay workers or exposing people to health and safety risks. This includes activities of site workers, clients and suppliers.

Staff monitoring and reviews.

Ask people if they know of any corruption. Monitor behaviour and any relevant personal indicators of risk, for example financial problems, gambling habits etc. This must be done with due regard for employee's personal rights.

Site monitoring

Site monitoring, particularly of time sheets, site equipment and material. This need to be coordinated with accounting cost controls, accounting audits and purchasing procedures.

Post project review

Include consideration of anomalies, inefficiencies and failure costs that might indicate possible corruption or fraud.

Signed:

MD of Szerelmey Limited
Date: 6th April 2023

Signed:

MD of Szerelmey Restoration Ltd
Date: 6th April 2023

Signed:

Director of Szerelmey (GB) Ltd
Date: 6th April 2023