VIAMED LTD

Failure to Prevent Fraud Policy

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1. Purpose

Viamed Ltd is committed to conducting all business honestly, ethically and with integrity. We operate a zero-tolerance approach to fraud and expect the same standards from all employees, directors, contractors, consultants, suppliers and business partners.

The purpose of this policy is to:

- Prevent fraudulent activity within the organisation.
- Protect customers, suppliers, employees and the wider public.
- Support compliance with applicable UK legislation, including the Economic Crime and Corporate Transparency Act 2023.
- Promote a culture of honesty, transparency and accountability.
- Ensure all employees understand their responsibilities in identifying, preventing and reporting suspected fraud.

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2. Scope

This policy applies to:

- All employees.
- Directors.
- Temporary and agency workers.
- Contractors and consultants.
- Anyone acting on behalf of Viamed Ltd.

The policy applies to all company activities including:

- Purchasing.
- Sales.
- Finance.
- Stock management.
- Manufacturing and assembly.

- Service and repair.
- Calibration.
- Customer support.
- Supplier management.
- Information systems.
- Any other business activities undertaken by the company.

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3. Company Commitment

Viamed Ltd is committed to maintaining the highest standards of integrity throughout its operations.

We will:

- Conduct business honestly and fairly.
- Maintain effective financial and operational controls.
- Keep accurate and complete business records.
- Investigate allegations of fraud promptly and impartially.
- Take appropriate disciplinary action where misconduct is identified.
- Report criminal offences to the relevant authorities where appropriate.
- Continually review our procedures to reduce the risk of fraud.

Fraud of any kind will not be tolerated.

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4. What is Fraud?

Fraud is any dishonest act intended to obtain an unfair or unlawful financial or personal advantage, or to cause loss to another party.

Examples include, but are not limited to:

- Theft of company money or assets.
- False expense claims.
- Falsifying timesheets or attendance records.
- Creating or approving false invoices.
- Manipulating financial records.
- Providing false information to customers.
- Misrepresenting products or services.
- Altering quality, calibration or service records.
- Forging signatures or approvals.
- Deliberately concealing errors for financial gain.
- Misuse of company purchasing accounts or credit facilities.
- Accepting or offering dishonest financial incentives.
- Knowingly providing false information during audits or inspections.

Fraud may be committed by employees, suppliers, customers, contractors or other third parties.

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5. Examples Relevant to Viamed

Examples that may arise within our business include:

- Processing purchases for goods that were not received.
- Creating false supplier invoices.
- Diverting company payments through unauthorised bank account changes.
- Deliberately altering calibration, inspection or service documentation.
- Issuing certificates for work that has not been completed.
- Misrepresenting the performance, approval or specification of products.
- Removing stock or equipment without authorisation.
- Falsifying warranty claims.
- Claiming expenses or mileage that were not incurred.
- Knowingly providing inaccurate information during customer audits or supplier assessments.
- Circumventing established purchasing or approval procedures for personal benefit.

These examples are illustrative only and do not represent an exhaustive list.

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6. Responsibilities

Directors and Senior Management

Senior management are responsible for:

- Promoting a culture of integrity.
- Maintaining appropriate internal controls.
- Assessing fraud risks.
- Reviewing this policy annually.
- Investigating reported concerns.
- Ensuring appropriate corrective action is taken.

Managers

Managers are responsible for:

- Leading by example.
- Ensuring employees understand this policy.
- Monitoring compliance within their areas.
- Escalating suspected fraud promptly.

Employees

Every employee is responsible for:

- Acting honestly and ethically.
- Following company procedures.

- Protecting company assets.
- Maintaining accurate records.
- Remaining alert to potential fraud.
- Reporting concerns immediately.
- Cooperating fully with investigations.

Employees must never ignore suspected fraudulent activity.

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7. Reporting Concerns

Any employee who suspects fraud, attempted fraud or dishonest behaviour must report their concerns as soon as reasonably possible.

Concerns may be reported to:

- Their Line Manager.
- A Director.
- The Managing Director.

Reports will be handled confidentially wherever possible.

Employees who raise genuine concerns in good faith will not suffer retaliation or victimisation for doing so.

Deliberately making false or malicious allegations may itself result in disciplinary action.

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8. Consequences of Fraud

Fraud is regarded as gross misconduct.

Where fraud is identified, Viamed Ltd may take one or more of the following actions:

- Internal investigation.
- Disciplinary action up to and including dismissal.
- Recovery of financial losses where appropriate.
- Termination of supplier or contractor relationships.
- Notification to customers where required.
- Reporting to law enforcement or regulatory authorities.
- Civil or criminal proceedings where appropriate.

The company will cooperate fully with any official investigation.

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9. Related Policies

This policy should be read alongside:

- Anti-Bribery and Corruption Policy.
- Whistleblowing Policy.
- Code of Conduct.
- Disciplinary Procedure.
- Information Security Policy.
- Quality Management System procedures.
- Purchasing and Supplier Approval procedures.

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10. Monitoring and Review

The effectiveness of this policy will be reviewed at least annually by senior management, or sooner if:

- legislation changes;
- significant fraud risks are identified;
- a fraud incident occurs; or
- improvements to company controls are required.

Management reviews will consider:

- Reported incidents.
- Near misses.
- Internal audit findings.
- Customer or supplier concerns.
- Effectiveness of existing controls.
- Opportunities for continual improvement.

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11. Policy Statement

Viamed Ltd is committed to maintaining an open, honest and ethical working environment. Every individual associated with the company has a responsibility to protect its reputation, assets and customers by preventing, identifying and reporting fraudulent activity.

Failure to comply with this policy may result in disciplinary action and, where appropriate, referral to the relevant authorities.