

# CAP Worldwide Anti-Fraud Policy

<b>Policy Name:</b>	Anti-Fraud Policy		
<b>Company:</b>	CAP Worldwide	<b>Policy Owner(s):</b>	Directors / HR
<b>Policy #:</b>	CAP029	<b>Version:</b>	V1.0
<b>Effective Date:</b>	Jun 2025	<b>Scope:</b>	All Staff
<b>Approved by:</b>	Andrew Hopgood, COO and Jo Layton, CEO		

## Introduction and Scope

CAP Worldwide (CAP) is committed to maintaining the highest standards of integrity, transparency, and ethical conduct in all aspects of our business. Fraud, whether internal or external, undermines our values and has the potential to damage our reputation, financial standing, and relationships with stakeholders.

This policy aims to prevent, detect, and address any fraudulent activities within the organisation.

The purpose of this Anti-Fraud Policy is to:

- Clearly define what constitutes fraud and fraudulent activities.
- Establish procedures for reporting and investigating suspected fraud.
- Outline the responsibilities of employees and management in preventing and responding to fraud.
- Provide guidance on how to handle and address any incidents of fraud.

This policy applies to all employees, contractors, agents, suppliers, and brand partners of CAP Worldwide. It covers any activities that might constitute fraud including, but not limited to, the misuse of company resources, financial misrepresentation, and any other dishonest behaviour aimed at gaining an unfair advantage.

This Anti-Fraud Policy sets a clear and transparent framework for addressing fraud, promoting a culture of integrity, and ensuring that any fraudulent behaviour is swiftly identified and dealt with.

## Definitions

Fraud is defined as any deliberate act of deception or dishonesty for personal or financial gain. This includes, but is not limited to, the following examples:

- **Financial Fraud:** Falsifying financial statements, misappropriating funds, or manipulating accounting records.
- **Billing Fraud:** Submitting false or inflated invoices, altering or duplicating invoices, or billing for goods or services not provided.
- **Employee Fraud:** Theft, bribery, or unauthorised use of company assets or resources.

- **Expense Fraud:** Submitting false or inflated expense claims or using company funds for personal purposes.
- **Supplier Fraud:** Collusion with suppliers or partners to inflate prices or deliver substandard products or services.
- **Data Fraud:** The unauthorised use, access, or sharing of sensitive or confidential information for personal gain.
- **Bribery and Corruption:** Offering, giving, soliciting, or accepting any form of bribe or kickback in exchange for business advantages.

## Responsibilities

- **Leadership and Management:** Senior leadership and department managers are responsible for creating a culture of transparency and integrity. They must ensure that this policy is communicated effectively to all employees and stakeholders, and that a zero-tolerance approach to fraud is adopted. Leadership is also responsible for investigating any alleged fraud and taking appropriate action.
- **Employees:** All employees are expected to act with honesty and integrity, adhere to company policies, and report any concerns related to fraud or suspicious activities. Employees are encouraged to raise any concerns without fear of retaliation.

## Prevention

CAP is committed to preventing fraud by implementing the following measures:

- **Internal Controls:** We will maintain strong internal controls, including segregation of duties, approval processes, and regular audits, to prevent and detect fraudulent activities.
- **Employee Training:** We will regularly train employees on fraud prevention, detection, and reporting mechanisms, ensuring that they understand the importance of integrity and compliance with this policy.
- **Supplier and Partner Vetting:** We will ensure that our suppliers, contractors, and other brand partners adhere to ethical standards and undergo appropriate due diligence before entering into agreements with them.
- **Whistleblowing Mechanism:** A confidential reporting system will be provided for employees, contractors, or third parties to report suspected fraud without fear of retaliation.

## Reporting

Employees and third parties are encouraged to report any suspicions of fraudulent activity, either in relation to internal operations or dealings with external parties. Suspected fraud can be reported through the following channels:

- **Internal Reporting:** Employees can report concerns directly to their line manager.
- **Anonymous Reporting:** Employees and third parties can also report suspicions to one of the Directors in confidence. Alternatively, employees can also contact Lucilla Kearsy at People Business, our external HR Consultancy, with their concerns on +44 (0) 1932 874944.
- **External Reporting:** In cases of significant fraud, or where legal obligations require, fraud may be reported to external authorities, such as regulatory bodies or law enforcement agencies.

## Investigation

When a potentially fraudulent incident is reported, CAP will take the following steps:

- **Initial Review:** A preliminary investigation will be conducted to assess the nature and scope of the suspected fraud. This will include gathering relevant evidence and conducting interviews with involved parties.
- **Formal Investigation:** If the initial review indicates the possibility of fraud, a formal investigation will be initiated. This may involve legal counsel, forensic accountants, or other specialists as necessary.
- **Confidentiality:** Investigations will be conducted with confidentiality to protect the privacy and rights of all parties involved. Information will be shared only on a need-to-know basis.
- **Disciplinary Action:** If fraud is confirmed, disciplinary actions will be taken in accordance with company policies. These may include termination of employment, legal action, or reporting to regulatory bodies.

## Consequences of Fraud

Any employee, contractor, supplier or brand partner found to be involved in fraudulent activities will face strict consequences, up to and including:

- **Termination of Employment or Contract:** Employees involved in fraud may be terminated for cause, and business partners may have contracts terminated or suspended.
- **Legal Action:** In cases of significant fraud, CAP will pursue legal action, including criminal charges where appropriate, and seek to recover any losses incurred due to fraudulent activities.
- **Reputational Damage:** Fraud can damage the reputation of CAP. As such, any fraudulent activity may result in public disclosure and efforts to restore public trust.

## Acknowledgement

All employees, contractors, and business partners are required to read, understand, and adhere to this Anti-Fraud Policy. Acknowledgment of receipt and understanding of this policy will be obtained from all employees and key stakeholders, and it is included in the company Employee Handbook.

By doing business with CAP Worldwide, such as accepting an enquiry or confirming a booking, suppliers acknowledge and agree to comply with the principles outlined in this Anti-Fraud Policy.

The Anti-Fraud Policy also forms part of our CAPVerified partner onboarding process, and any brand partner joining our global supply chain must confirm their acceptance of the terms herein.

## Review and Reporting

To ensure the continued effectiveness of this Anti-Fraud Policy, the CAP Directors will:

- Regularly review and update the policy to reflect changes in regulations, best practices, and emerging fraud risks.

- Monitor compliance with this policy through internal audits, external reviews, and ongoing assessments of fraud risks.
- Encourage feedback from employees and stakeholders on ways to improve fraud prevention and detection measures.

**Version 1.0 June 2025**

<b>Policy Name:</b>	<b>Anti-Fraud Policy</b>		
<b>Version</b>	<b>Change</b>	<b>Date</b>	<b>Author</b>
<b>1.0</b>	Drafted and Implemented	<b>26.06.25</b>	AH/JL