



Anti-fraud and anti-corruption policy

1. Introduction

Sapphire Services (Kent) Ltd is committed to maintaining the highest ethical standards in all its activities. This policy outlines the organization's commitment to preventing fraud and corruption within the organization.

2. Definition of Fraud and Corruption

For the purposes of this policy, fraud and corruption include any act or omission that is intended to deceive or mislead, or that could be seen to influence improperly, an employee, agent, or contractor of Sapphire Services (Kent) Ltd. Examples of prohibited practices include bribery, embezzlement, fraud, and conflicts of interest.

3. Responsibilities

3.1 Employees

Employees are expected to adhere to a code of conduct that prohibits fraudulent and corrupt practices. Employees must notify their supervisor or the organization's compliance officer of any suspicions of fraudulent or corrupt activities.

3.2 Management

Management is responsible for ensuring that appropriate procedures are in place to prevent fraudulent and corrupt practices. Management must ensure that employees are trained on the policy and its implementation.

4. Reporting and investigating allegations

4.1 Reporting Allegations

Employees are encouraged to report any suspicions of fraudulent or corrupt activities to their supervisor or the organization's compliance officer. Reports can be made anonymously, if desired.

4.2 Investigating Allegations

Sapphire Services will establish an investigation team to investigate allegations of fraudulent or corrupt activities. The investigation team will collect evidence and take appropriate disciplinary action.



SAPPHIRE SERVICES (KENT) LTD

5. Disciplinary actions

Employees who violate this policy will be subject to disciplinary action, up to and including termination of employment. Contractors and consultants who violate this policy may have their contracts terminated.

6. Review and revision

This policy will be reviewed and revised as necessary to ensure that it remains effective and appropriate.

7. Distribution and training

This policy will be distributed to all employees and relevant third parties. The organization will provide training to employees on the policy and its implementation.

By implementing this anti-fraud and anti-corruption policy, Sapphire Services (Kent) Ltd aims to maintain the highest ethical standards and prevent fraudulent and corrupt practices within the organization.

Signed 

Date 2nd January 2025

John Fletcher
Company Director

Review date for this document 1st January 2026 or when circumstance / legislation indicates.