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MOORHEAD EXCAVATIONS LTD
BRIBERY FRAUD MALPRACTICE POLICY

POLICY STATEMENT

Moorhead Excavations Ltd are committed to conducting all of its business in an honest and ethical manner, and has a zero tolerance policy towards fraud, bribery and any form of dishonesty in its transactions.

The Company will uphold all laws relevant to countering bribery, fraud and corruption in all the jurisdictions in which it operates. However, no matter where the Company, its staff or operatives carry out their responsibilities, it and they must abide by the laws of the UK, including the Bribery Act 2010, in respect of their conduct.

Bribery and corruption are punishable for individuals by up to ten years imprisonment and or an unlimited fine, and if the Company is found to have taken part in corruption it could also face a fine and be excluded from tendering for public contracts, as well as suffering damage to its reputation.

The Company could also attract liability under the Bribery Act 2010 if a person associated with it is found to have paid a bribe on its behalf, and the Company did not have adequate procedures in place to prevent such conduct. The Company therefore takes its legal responsibilities very seriously. Likewise fraud may lead to civil and/or criminal proceedings.

Any allegation that a member of the Company has acted in a manner that is illegal or inconsistent with this Policy will be treated seriously, regardless of the seniority of those involved. Disciplinary action up to and including dismissal or expulsion may result. Where it is believed that a criminal offence may have been committed, the police and other relevant bodies may be informed.



OBJECTIVES OF THE POLICY

The aims of this Policy are to:

Promote a culture of honesty, integrity and professionalism; set out the Company's responsibilities, and of those working for or on behalf of the Company, in observing and upholding the Company's position on bribery, fraud and corruption; and provide information and guidance to those working for the Company on how to recognise and address bribery, fraud and corruption issues.

APPLICATION OF THE POLICY

This Policy applies to the conduct of all members of the Company and any third party acting on its behalf, a non exhaustive list of which includes permanent staff, operatives and contractors or any other person associated with the Company.

BRIBERY

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. The advantage sought or the inducement offered does not have to be financial or remunerative in nature, and may take the form of improper performance of an activity or function.

GIFTS AND HOSPITALITY

The Company's Financial Regulations explain the Company's policy towards gifts and hospitality. In either the giving or receiving of gifts or hospitality, there must be no explicit or implicit attempt to influence third parties or be influenced by third parties in relations with the Company.

WHAT IS NOT ACCEPTABLE?

It is not acceptable for any member of the Company (or someone on their behalf) to:

Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;

Accept payment from a third party that they know or suspect is offered with the expectation that it will obtain a business advantage for them;

Accept a gift or hospitality from a third party if they know or suspect that it is offered or provided with an expectation that a business advantage will be provided by the Company in return;

Threaten another member of the Company who has refused to commit a bribery offence or who has raised concerns under this policy; or engage in any activity that might lead to a breach of this policy.

The Company only makes charitable donations that are legal and ethical under local laws and practices. No donations of any kind must be offered or made without the prior approval of the Managing Director.

FRAUD

There is no precise legal definition of fraud. It is generally taken to involve theft - the removal of cash or assets to which the fraudster is not entitled - or false accounting - the falsification or alteration of accounting records or other documents. The Company is potentially exposed Inter alia to:

External fraud, perpetuated by individuals outside the organisation;

Internal fraud, perpetuated by management or other employees.

RECORD-KEEPING

The Company must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

Signed: 

Date: 17.01.13

Ken Moorhead – Managing Director

Review Date	Revision Description	Authorised	Revision
17.01.2013	Review & Sign off	KM	-