



Capital Staffing Services Ltd
COUNTER FRAUD POLICY FOR CAPITAL STAFFING
SERVICES

Introduction

This ANTI-BRIBERY AND CORRUPTION POLICY relates to actions and activities during the financial year 05 April 2023 to 04 April 2024.

The statement sets down **Capital Staffing Services Ltd** commitment to preventing Bribery and Corruption in our business activities and the steps we have put in place with the aim of ensuring that there is no bribery or corruption in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of **Capital Staffing Services Ltd** which are as follows:

CAPITAL STAFFING SERVICES LTD UNDER COMPANY NUMBER 04257718 ON THE FRAMEWORK OF RM6161 AND CQC REGISTERED ACTS AS A RECRUITING AGENCY FOR TEMPORARY RECRUITMENT OF CLINICAL AND HEALTHCARE STAFF FOR ALL JOB ROLES AND BANDS ACROSS THE UK, APPROVED BY NHS ENG.

The Company currently operates in the following countries:

United Kingdom territories.

Policy Statement: Capital Staffing Services is committed to preventing, detecting, and addressing fraud in all aspects of our business operations. We have zero tolerance for any form of fraud, including but not limited to, theft, embezzlement, misappropriation of assets, falsification of records, corruption, bribery, kickbacks, collusion, and other fraudulent activities. We are committed to maintaining a strong internal control environment and promoting a culture of honesty, integrity, and accountability among our employees, contractors, and stakeholders.

Compliance with Laws: Capital Staffing Services will comply with all applicable laws, regulations, and industry standards related to fraud prevention and detection.

This includes but is not limited to, relevant fraud-related laws and regulations in the jurisdictions where we operate, such as the Fraud Act 2006 in the UK, and other applicable laws related to financial and accounting practices.

Fraud Prevention Measures: Capital Staffing Services will implement robust fraud prevention measures, including but not limited to, the following:

a. Segregation of Duties: We will ensure that appropriate segregation of duties is maintained in all key financial and operational processes to prevent any single individual from having excessive control or authority over financial transactions.

b. Internal Controls: We will establish and maintain effective internal controls to ensure that all financial transactions are authorized, recorded, and reported accurately and timely, and that assets are safeguarded against fraud and misappropriation.

c. Risk Assessment: We will conduct regular risk assessments to identify and assess potential fraud risks in our business operations, and implement appropriate controls and mitigation measures to minimize these risks.

d. Code of Conduct: We will have a comprehensive code of conduct that sets clear expectations for our employees, contractors, and stakeholders regarding their conduct and ethical responsibilities, including the prohibition of fraud and other fraudulent activities.

e. Employee Screening: We will conduct thorough background checks and screening of all employees and contractors who have access to financial transactions or sensitive information to mitigate the risk of insider fraud.

f. Whistleblowing: We will provide a confidential and accessible whistleblowing mechanism for employees, contractors, and stakeholders to report any suspected fraud or fraudulent activities, and we will take appropriate actions to investigate and address such reports in a timely and confidential manner.

Fraud Detection and Investigation: Capital Staffing Services will implement measures to detect and investigate suspected fraudulent activities, including but not limited to:

a. Monitoring and Data Analysis: We will use data analytics and other monitoring techniques to identify potential fraud indicators, such as unusual patterns or trends in financial transactions, discrepancies in records, or other anomalies.

b. Internal Audits: We will conduct regular internal audits of our financial and operational processes to assess compliance with internal controls and detect any potential fraud or irregularities.

c. Investigation and Reporting: We will investigate all reported cases of suspected fraud promptly and thoroughly, and we will take appropriate actions to address

confirmed fraud cases, including reporting to relevant authorities, recovering assets, and implementing corrective measures to prevent future occurrences.

Employee Responsibilities: All employees and contractors of Capital Staffing Services are responsible for preventing and detecting fraud in their respective roles. This includes but is not limited to:

a. **Compliance with Policies and Procedures:** Employees and contractors must comply with all relevant policies, procedures, and internal controls related to fraud prevention and detection, including but not limited to the code of conduct, financial policies, and internal control measures.

b. **Reporting Suspected Fraud:** Employees and contractors must report any suspected fraud or fraudulent activities promptly through the established reporting channels, including the confidential whistleblowing mechanism, and cooperate in any investigations related to fraud.

c. **Ethical Conduct:** Employees and contractors must maintain high standards of ethical conduct in their business activities, and avoid any behavior that may constitute

This COUNTER FRAUD POLICY Statement has been approved and authorised by:

Name: Gerard McHugh

Position: Chief Executive Officer

Date: 14/04/2023

Signature:



