



Anti Fraud, Malpractice, Bribery and Corruption Policy

General:

Newline Logic Limited ('the Company'), trading as Daracore, value its reputation for ethical behaviour and for financial probity and reliability. The Company are committed to the prevention, deterrence and detection of fraud, malpractice, bribery and all other corrupt business practices. The Company have a zero tolerance toward such behaviour. Losses due to fraud, malpractice, bribery and all other corrupt business practices can be more than just financial in nature; they can potentially damage the company's reputation as well.

It is required that all employees of the Company act honestly and with integrity at all times and to safeguard the company resources for which they are responsible. To comply with all legal and regulatory requirements governing the lawful and ethical conduct of business. To respect customers, suppliers and other parties with whom they interact to achieve objectives by conducting business in an ethical, lawful and professional manner.

The prevention, detection and reporting of fraud, malpractice and bribery is the responsibility of all employees throughout the Company. If any employee has a suspicion of any act of fraud, malpractice or bribery they should confidentially report this to their Senior Manager and or a Director of the Company. The Board will ensure that no employee will suffer in any way as a result of reporting reasonably held suspicions of fraud, malpractice, bribery and corruption.

The Company board of Directors will ensure that all breaches or suspected breaches of this policy are fully investigated and, if appropriate, invoke disciplinary measures and take prompt action to remedy the breach and prevent any repetition.

Bribery:

The offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement to or from any person or Company, wherever they are situated and whether they are a public official or body or private person or Company, to gain any commercial, contractual or regulatory advantage for the Company in a way which is unethical or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual is prohibited.

The Company recognises that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another. This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the Company or of the person or body employing them or whom they represent.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, and are proportionate and are properly recorded:

- Normal and appropriate hospitality
- The giving of a ceremonial gift at a special time
- Donations to charitable events

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to a Director of the Company before proceeding.

Fraud and Malpractice:

The Company already has procedures in place that reduce the likelihood of fraud occurring. These include documented procedures and systems of internal control. In addition, the Company tries to ensure that a risk (and fraud) awareness culture exists in this organisation.

This policy applies to any irregularity, or suspected irregularity, involving employees as well as consultants, vendors, contractors, and / or any other parties with a business relationship with this organisation. Any investigative activity required will be conducted without regard to any person's relationship to this organisation, position or length of service.

Fraud and Malpractice comprises both the use of deception to obtain an unjust or illegal financial advantage and intentional misrepresentations affecting any aspect of company activity by one or more individuals among management, staff or third parties.

All Managers and staff have a duty to familiarise themselves with the types of improprieties that might be expected to occur within their areas of responsibility and to be alert for any indications or irregularity.

Fraud and Malpractice Plan:

The purpose of this plan is to ensure that timely and effective action is taken in the event of fraud/malpractice. The plan acts and increases the chances of a successful investigation.

The plan defines authority levels, responsibilities for action, and reporting seniors in the event of a suspected fraud or malpractice.

- Prevent further loss
- Establish and secure evidence necessary for criminal and / or disciplinary action
- Notify the Board of Directors immediately
- Determine when and how to contact the police and establish Seniors of communication
- Assign responsibility for investigating the incident
- Minimise and recover losses
- Review the reasons for the incident, the measures taken to prevent a recurrence, and determine any action needed to strengthen future responses to fraud or malpractice
- Keep all personnel with a need to know suitably informed about the incident as the investigation develops
- Help promote an anti-fraud culture by making it clear to employees and others that the Company will pursue all cases of fraud or malpractice vigorously taking appropriate legal and / or disciplinary action in all cases where that is justified

Action Following Detection:

When any member of staff suspects that a fraud has occurred, he / she must notify his / her Senior Manager immediately. Speed is of the essence and this initial report should be verbal and must be followed up within 24 hours by a written report addressed to the Senior Manager which should cover:

- The amount / value if established
- The position regarding recovery or company exposure
- The period over which the irregularity occurred, if known
- The date of discovery and how the suspected fraud / malpractice was discovered
- The type of irregularity and what led to it i.e.:
 - a. Was there a breakdown in the systems of internal control, or
 - b. Is there any inherent weakness in the system of internal control which allowed it to occur
- Whether the person responsible has been identified
- Whether any collusion with others is suspected
- Details of any actions taken to date
- Any other information or comments which might be useful

Senior Managers should contact the Board of Directors with the report immediately. They must agree with the Board of Directors what action is to be taken.

Senior Managers along with the Board of Directors should undertake an initial enquiry to ascertain the facts. The purpose of the initial enquiry is to confirm or repudiate, as far as possible, the suspicions that have arisen so that, if necessary, disciplinary action including further and more detailed investigation may be instigated.

Managers conducting initial enquires must be conscious that internal disciplinary action and / or criminal prosecution may result. If such action is later taken then under proper procedure the member of staff concerned has a right to representation and may have the right to remain silent. Utmost care is therefore required from the outset in conducting enquiries and interviews.

In addition, in order to protect The Company from further loss and destruction of evidence, it may be necessary to suspend the member of staff concerned, immediately after the allegation has been made or following the submission of the Manager's initial verbal report.

All findings should be documented along with any evidence, if the matter is to be reported to the police, they will require examination of all documentation and evidence to be able to make a decision on whether there is sufficient evidence to support a criminal prosecution.

Authorised by the Directors, for and on behalf of Newline Logic Limited, trading as Daracore:

Signed: 

Kevin Hodgers

Director

March 2020