

# Anti-fraud Policy

**Starfish 9 Ltd. Anti-fraud Policy 2022 - Issue 3**

(Last Review Jan 2022 - Next Planned Review Jan 2023)

# Anti-fraud

## Background

This anti-fraud policy has been established to facilitate the development of controls which will aid in the detection and prevention of fraudulent behaviour affecting the business operations of Starfish 9 Limited.

It is the intention of Starfish 9 to promote consistent organizational behavior by providing guidelines and assigning responsibility for the development of controls and conduct of investigations.

## Scope of Policy

This policy applies to any suspected fraudulent activity, involving the business operations of Starfish 9 Limited, as well as its Company Directors, Senior Managers and staff, as well as any other consultants, vendors, contractors, outside agencies with whom we interact.

Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship within the Company.

## Policy

Company Directors are responsible for the detection and prevention of fraud, including the misappropriation of financial asset, and any other inappropriate conduct. Fraud is defined as the intentional false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury / loss.

Each member of the management team will be familiar with the types of improprieties that might occur within his or her area of responsibility, and be alert for any indication of irregularity.

Any fraud that is detected or suspected must be reported immediately to the Managing Director who shall coordinate all resulting action and investigation.

**Name:** John Jessimer

**Signed:** 

**Position:** Managing Director

**Date:** 7 January 2022

