
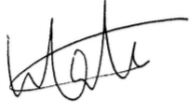



LATUS HEALTH

Document No:	Date Effective:	Document Title:
HR.04.001	02 May 20	Anti-Fraud and Corruption

Approvals

The electronic signatures below certify that this policy has been reviewed and accepted and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Signature	Position	Date
Prepared by:	 Victoria Tait	Quality Specialist	15 Apr 20
Reviewed by:	 Will Latus	Director	02 May 20
Approved by:	 Will Latus	Director	02 May 20

Amendment Record

This policy has been reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

Page No.	Context	Revision	Date

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1. SCOPE

This policy applies to all (both clinical and non-clinical) Latus Health Ltd. (the “Company”) employees.

2. PURPOSE

This policy is intended to provide direction and help to employees and subcontractors who may identify suspected fraud. It provides a framework for responding to suspicions of fraud, corruption, bribery and other forms of dishonesty.

3. DEFINITIONS

Fraud: a) A deliberate intent to acquire money or goods dishonestly through the falsification of records or documents; b) The deliberate changing of financial statements or other records by an employee, subcontractors or Director of the Company.

Theft: Dishonestly acquiring or disposing of physical or intellectual property belonging to the Company, clients or colleagues.

Misuse of equipment: Deliberately misusing equipment belong to the Company.

Abuse of Position: Exploiting a position of trust within the Company.

Bribery: Offering, promising or giving someone a financial or other advantage to encourage them to perform their functions or activities improperly, including where it is known or believed that the acceptance of the advantage constitutes improper performance. It also means asking or agreeing to accept a bribe.

4. RESPONSIBILITIES

In relation to the prevention of fraud, theft, misuse of equipment and abuse of position, specific responsibilities are as follows:

a. The Company Directors

Overall responsibility for managing these risks has been delegated to the Company Directors.

- Ensure that all Company Staff are aware of the Company anti-fraud and corruption policy and know what their responsibilities are at Induction and at policy reviews.
- Undertake a regular review of the fraud risks associated with the Company business activities.
- Design of an effective control environment to prevent fraud.
- Ensure appropriate action is taken to minimise the risk of previous frauds occurring in the future.
- Ensuring that an adequate system of internal control exists within their areas of responsibility and these are effective.
- Prevent and detect fraud as far as possible.
- Assess the types of risk involved in the operations for which they are responsible.
- Review the control systems for which they are responsible for regularly.

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- Ensure that controls are being complied with and their systems continue to operate effectively.

b. Company Staff and Workers

Every worker is responsible for:

- Acting with propriety in the use of the Company's resources and handling and use of funds if they are involved with cash, receipts, payments or dealing with suppliers.
- Conducting themselves with integrity, openness and honesty.
- Being aware of the possibility that unusual events or transactions could be indicators of fraud.
- Alerting their manager if they believe an opportunity for fraud exists.
- Through the Company's procedure, report immediately if they suspect that a fraud has been committed or they witness any suspicious acts.
- Co-operate fully with any investigations of an internal or external nature.

5. PROCEDURE:

Reporting Concerns about Fraud, Corruption or Bribery

Action:

- Note your concerns: Record details including your concerns, names, dates, times and details of conversations and possible witnesses. Time, date and sign your notes. Ensure the security and confidentiality of your evidence.
- Report your suspicion directly to a Director.
- Do not confront the suspect or convey concerns to anyone other than those authorised.
- Do not try to investigate yourself.
- Do not be afraid of raising your concerns, you will not suffer discrimination or victimisation by following correct procedures.

Investigation:

Reporting of suspected irregularities is essential to ensure a proper investigation by a Director or designated officer who will:

- Deal promptly with the matter as soon as is practicable after the loss has been identified.
- Record evidence required ensuring the security and confidentiality of evidence
- Work closely with other senior management within the Company and other agencies such as the Police and the Courts.
- Ensure maximum recoveries are made on behalf of the Company.

6. Record Keeping

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Access to the Company Policies and Procedures will be given at Induction. This policy will be monitored biennially by the Company to review its effectiveness and will be updated, and employees notified in accordance with any necessary changes.

7. TRAINING

All employees will be trained to appreciate the need for prevention of fraud, theft, misuse of equipment and abuse of position.

8. Related Documents:

Company Whistleblowing policy