



FRAUD POLICY STATEMENT

Marston's requires all staff at all times to act honestly and with integrity and to safeguard the resources for which they are responsible. Fraud is an ever-present threat to these resources and hence must be a concern to all members of staff. The purpose of this statement is to set out your responsibilities with regard to the prevention of fraud.

What is Fraud?

Theft, deception, bribery, forgery, corruption, false accounting and conspiracy to commit these offences. For practical purposes fraud may be defined as the use of deception with the intention of obtaining an advantage, avoiding an obligation or causing loss to another party.

The business is responsible for:

- Developing and maintaining effective controls to prevent fraud
- Carrying out vigorous and prompt investigations if fraud occurs
- Taking appropriate legal and /or disciplinary action against the perpetrators of fraud
- Taking disciplinary action against staff where staff failures have contributed to the commission of fraud

Managers should be responsible for:

- Identifying the risks to which the systems and procedures are exposed
- Developing and maintaining effective controls to prevent and detect fraud
- Ensuring that controls are being complied with

Individual Members of Staff are responsible for:

- Acting with propriety in the use of official resources and in the handling and use of corporate funds whether they are involved with cash or payments systems, receipts or dealing with contractors or suppliers
- Reporting details immediately to (their line manager or next most senior manager) if they suspect that a fraud has been committed or see any suspicious acts or events.

Bribery

- Employees engaging in acts of bribery on the company's behalf are committing a criminal offence. Employees are warned against offering financial or non-financial incentives to individuals to act illegally, improperly or impartially in other companies, organisations or public bodies.
- The request or receipt of a bribe is a criminal offence. Receipt of hospitality should be recorded in the Hospitality Register accessed through Marston's Exchange.

Approved by the Audit Committee – July 2011