

Oxford Professional Education

Group Policy date July 2023

Review date July 2024

Reference number

Fraud

Policy

Background

The OXPEG fraud policy is established to facilitate the development of controls that will aid in the detection and prevention of fraud against OXPEG. It is the intent of OXPEG to promote consistent organizational behaviour by providing guidelines and assigning responsibility for the development of controls and conduct of investigations.

Scope of Policy

This policy applies to any irregularity, or suspected irregularity, involving employees, consultants, vendors, contractors, outside agencies doing business with employees of such agencies, and/or any other parties with a business relationship with OXPEG.

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

Policy

Management is responsible for the detection and prevention of fraud, misappropriations, and other irregularities. 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. 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 irregularity that is detected or suspected must be reported immediately to the Senior Manager Finance Rosemary Craig, who coordinates all investigations both internal and external.

Actions Constituting Fraud

The terms defalcation, misappropriation, and other fiscal irregularities refer to, but are not limited to:

- Any dishonest or fraudulent act
- Misappropriation of funds, securities, supplies, or other assets
- Impropriety in the handling or reporting of money or financial transactions
- Profiteering as a result of insider knowledge of company activities
- Disclosing confidential and proprietary information to outside parties
- Disclosing to other persons securities activities engaged in or contemplated by OXPEG



- Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to OXPEG. Exception: Gifts less than £50 in value.
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; and/or
- Any similar or related irregularity

Other Irregularities

Irregularities which are not fraudulent concerning an employee's moral, ethical, or behavioural conduct should be resolved by departmental management and Human Resources.

If there is any question as to whether an action constitutes fraud, contact the Senior Manager Rosemary Craig for guidance.

Investigation Responsibilities

The Senior Manager Rosemary Craig has the primary responsibility for the investigation of all suspected fraudulent acts as defined in the policy. If the investigation substantiates that fraudulent activities have occurred will issue reports to the OXPEG Director Jane Young.

Decisions to prosecute or refer to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made in conjunction with legal counsel, as will final decisions on disposition of the case.

Confidentiality

The Senior Management Team treats all information received confidentially. Any employee who suspects dishonest or fraudulent activity will notify the Senior Manager Rosemary Craig immediately, and should not attempt to personally conduct investigations or interviews/interrogations related to any suspected fraudulent act (see REPORTING PROCEDURE section below).

Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found



of wrongful conduct and to protect OXPEG from potential civil liability.

Authorization for Investigating Suspected Fraud

Senior Managers /Directors or any appointed member of the Investigation Team will have:

- Free and unrestricted access to all Company records and premises, whether owned or rented; and
- The authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who might use or have custody of any such items or facilities when it is within the scope of their investigation.

Reporting Procedures

Great care must be taken in the investigation of suspected improprieties or irregularities to



avoid mistaken accusations or alerting suspected individuals that an investigation is underway.

An employee who discovers or suspects fraudulent activity will contact the Senior Manager Rosemary Craig immediately. The employee or other complainant may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual, his or her legal adviser or representative, or any other inquirer should be directed to the Senior Manager Rosemary Craig. No information concerning the status of an investigation will be given out. The proper response to any inquiries is: "I am not at liberty to discuss this matter." Under no circumstances should any reference be made to "the allegation," "the crime," "the fraud," "the forgery," "the misappropriation," or any other specific reference.

The reporting individual should be informed of the following:

- Do not contact the suspected individual to determine facts or demand restitution.
- Do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by a member of the Investigation Team.

Termination

If an investigation results in a recommendation to terminate an individual, the recommendation will be reviewed for approval by the designated representatives from Human Resources and if necessary, by outside counsel, before any such action is taken.

Administration

The Company Director Jane Young is responsible for the revision, interpretation, and application of this policy. The policy will be reviewed annually and revised as needed.

Approval



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Jane Young, Managing
Director February 2020

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