



BTTAD Fraud Policy

Introduction

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

The term “Fraud” is used to describe such acts as deception, bribery, forgery, extortion, theft, conspiracy, embezzlement, misappropriation, false representation, concealment and collusion.

This policy applies to any irregularity, or suspected irregularity, involving employees as well as members, volunteers, consultants, vendors, contractors, outside agencies doing business with employees of such agencies, and/or any other parties with a business relationship with the BTTAD. Any investigative activity required will be conducted without regard to the suspected wrongdoer’s length of service, position/title, or relationship to the BTTAD.

Any irregularity that is detected or suspected must be reported immediately to the Chairman (or in his/her absence the Secretary), who will coordinate all investigations, both internal and external.

Scope of the BTTAD Policy

The BTTAD requires all staff and volunteers at all times to act honestly and with integrity and to safeguard the resources of the BTTAD, for which they are responsible.

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

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

Management (ie the Officers of the BTTAD) 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 officer of the BTTAD 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.

Computer fraud is where IT equipment has been used to manipulate programs or data dishonestly or where the use of an IT system was a material factor in the perpetration of fraud. Theft or fraudulent use of computer time and resources is included in this definition. Obviously, persons outside as well as inside an organisation can perpetrate fraud. The criminal act is to attempt to deceive and the attempted fraud is therefore treated as

seriously as the accomplished fraud. The actions which could constitute fraud include defalcation, misappropriation, and other fiscal irregularities, 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 BTTAD activities
- Disclosing confidential and proprietary information to outside parties
- Disclosing to other persons securities activities engaged in or contemplated by the BTTAD
- Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to the BTTAD. Exception: Gifts less than £20 in value.
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; and/or any similar or related irregularity

Investigation Responsibilities

The Chairman 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, the Chairman will issue reports to appropriate designated personnel and, if appropriate, to the BTTAD Committee. The Chairman should undertake the initial enquiry to ascertain the facts. A decision as whether a breach has been made will rest with the Chairman.

The Secretary should assess the types of risk involved in the BTTAD operations and review and test the control systems regularly to ensure adequate compliance and effectiveness. Staff should alert the Chairman or Secretary where they believe the opportunity for fraud exists or where they believe fraud has occurred or is about to occur. Staff should also assist in any investigations by making available all relevant information. There should be a segregation of duties between the Chairman and the Secretary so that the control of a key function is not vested in one individual.

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

Confidentiality

The Chairman and the other Officers of the BTTAD must treat all information received confidentially. Any employee or volunteer who suspects dishonest or fraudulent activity will notify the Chairman or Secretary 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 innocent of wrongful conduct and to protect the Company from potential civil liability.

The Chairman will have 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 so as to avoid mistaken accusations or alerting suspected individuals that an investigation is under way.

An employee who discovers or suspects fraudulent activity will contact the Chairman or Secretary immediately. The employee or other complainant may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual, his or her representative, or any other inquirer should be directed to the Chairman. No information concerning the status of an investigation will be given out. The proper response to any enquiries 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:

1. Do not contact the suspected individual in an effort to determine facts or demand restitution.
2. Do not discuss the case, facts, suspicions, or allegations with any-one unless specifically asked to do so by the Chairman.

Disciplinary Action

The BTTAD will always take legal and/or disciplinary action where it feels it is appropriate. In the case of proven fraud or suspected fraud, the BTTAD will always refer the case to the Police and will cooperate fully with Police enquiries and these situations may result in the offenders being prosecuted.

Steps will always be taken to recover any losses suffered by the BTTAD resulting from fraud and a civil action against the perpetrator may be appropriate. The investigations may also examine whether there has been a failure of supervision and where this has occurred, appropriate action will be taken against those responsible.

Termination

If an investigation results in a recommendation to terminate an individual contract of employment or trade or both, the recommendation will be reviewed for approval by the Chairman or Secretary and the external Human Resources consultants, before any such action is taken. The decision to terminate an employee contract is made by the employee's management. Should the Officers believe the decision is inappropriate; the facts will be presented to The BTTAD Committee for a decision.

Administration

The Secretary is responsible for the administration, revision, interpretation and application of this policy. The policy will be reviewed annually and revised as necessary.

Approval

The approval of this policy and any subsequent amendments will be made by the BTTAD Committee.

Date: August 2011