

Anti-Fraud, Bribery and Corruption Policy

Context and overview

Key details

- Policy prepared by: Emily Clarke
- Next review date: 05/01/2023

Background

Andusia Holdings Limited are experts within the waste recovery industry. Established in February 2012, Andusia's goal is to divert waste from UK landfill whilst generate combined heat and power (CHP) for local communities and businesses.

Andusia Holdings Limited trade under three separate companies; Andusia Recovered Fuels Ltd represents the waste export business, Andusia Hazchem Treatment Limited represents the hazardous waste treatment arm and Andusia Resource Recovery Limited represents the growing UK RDF business.

The nature of our business requires that we work in conjunction with a range of suppliers. We hold strong established relationships with a supply base of professional UK waste management companies, a number of key international logistics providers and numerous Energy from Waste facilities across Europe.

The system also meets the requirements of BS EN ISO 9001

Introduction

Andusia Holdings Limited Anti-Fraud, Bribery and Corruption Policy is designed to promote an anti-fraud culture and consistent organisational behaviour across the company when dealing with cases of suspected fraud, bribery, or corruption. It sets out responsibilities for fraud prevention and detection and provides clear guidelines and procedures for reporting cases of suspected fraud and corruption and for the conduct of investigations.

Definitions

Fraud

The Fraud Act 2006 established three main offences of fraud, all of which carry a maximum sentence of 10 years and/or an unlimited fine. The offences are:

- Fraud by false representation

- Fraud by failing to disclose information or
- Fraud by abuse of position.

The following actions are among those which fall within the definition of fraud:

- Theft of company property, including information
- Misappropriation or use of company assets for personal gain
- False accounting – dishonestly destroying, defacing, concealing or falsifying any account, record or document required for any accounting purpose
- Forgery or alteration of company documents
- Wilful destruction or removal of company records
- Any computer- related activity involving the alteration, destruction, forgery or manipulation of data for fraudulent purposes or misappropriation of Andusia Holdings Limited owned software
- Falsification of travel and subsistence claims
- Knowingly generating or paying false claims or invoices
- Unauthorised disclosure of confidential information to third parties e.g. confidential details of current business activities or of bids or activities that the company is contemplating.

Bribery

Bribery is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for action which is illegal, unethical or a breach of trust.

Bribes can take many different forms, but typically they involve corrupt intent. A bribe could be:

- The direct or indirect promise of anything of value
- The offer of a fee, reward, or other advantage
- The giving of a donation.

Corruption

Corruption is the misuse of power for private gain.

The Bribery Act 2010 makes bribery and corruption a criminal offence and holds companies liable for failing to prevent acts of bribery or corruption by those working for or on its behalf, no matter where the act takes place.

Policy

This policy applies to all Andusia Holdings Limited directors and staff, whether permanent, fixed term, or temporary and to any consultants, sub-contractors and any other parties working with or on Andusia Holdings Limited behalf.

Andusia Holdings Limited expects high standards of conduct and probity from all its directors and staff and requires them at all times to act honestly, with integrity and to safeguard the resources for which they are responsible. The company also expects its suppliers, delivery partners and sub-contractors to maintain the same high standards of conduct and probity.

Andusia Holdings Limited is committed to developing an anti-fraud culture and actively seeks to deter and prevent fraud and corruption by ensuring that risks are identified and managed effectively. The company will not accept any level of fraud, bribery or corruption and will investigate thoroughly all suspected cases. Staff involved in an impropriety of any kind will be subject to the company's disciplinary procedures and legal action will be taken where appropriate.

To ensure that this policy is implemented effectively, Andusia Holdings Limited will:

- Identify and include fraud and corruption risks within its risk management processes
- Develop and maintain appropriate control systems to reduce the risk of fraud and corruption
- Encourage a culture of prevention and deterrence
- Ensure that responsibilities are clearly defined and communicated at all levels
- Encourage staff and others to be vigilant and report any genuine suspicions of fraudulent activity
- Ensure that if a fraud occurs, a prompt and thorough investigation takes place, without regard to position held or length of service of employees concerned
- Take appropriate disciplinary and legal action in all cases, where justified
- Review systems and procedures to prevent similar fraud should a fraud occur
- Ensure that anti-fraud considerations are built into tendering and sub-contracting processes.



Governance and Assurance

Company policy is approved by the Group Board which is chaired by the Chief Executive. Each policy is reviewed at least annually to ensure that we respond to our clients, business strategy, legislation, and any standards or codes of practices determined by the market. Our Quality, Health & Safety and Environmental Management systems are certified by the British Standards Institution who are approved by the United Kingdom Accreditation Service (UKAS).

Authorisation

Signed: 

Date: 05/01/2022

[A version of this statement is also available on the company's website.]