

Anti-Fraud and Bribery Policy

Organisation:	British Veteran Owned	Last Reviewed:	January 2026
Established:	January 2022	Next Review:	January 2027

1. Policy Statement

British Veteran Owned Ltd is committed to conducting all its activities with honesty, integrity, and transparency. The organisation adopts a zero-tolerance approach to fraud, bribery, and corruption in all forms. This policy applies to all directors, officers, volunteers, contractors, advisors, and any individuals acting on behalf of British Veteran Owned Ltd.

2. Purpose of the Policy

The purpose of this policy is to:

- Protect the organisation's funds, reputation, and assets
- Set clear expectations regarding acceptable conduct
- Provide a clear framework for preventing, identifying, and responding to fraud or bribery
- Support compliance with relevant UK legislation

3. Legal Framework

This policy reflects the organisation's obligations under relevant UK legislation, including but not limited to:

- Bribery Act 2010
- Fraud Act 2006
- Theft Act 1968

Fraud and bribery are criminal offences and may result in disciplinary action, termination of involvement with the organisation, and referral to law enforcement where appropriate.

4. Definitions

Fraud

Dishonestly making false representations, failing to disclose information, or abusing a position of trust for personal gain or to cause loss to another.

Bribery

Offering, giving, requesting, or receiving an advantage intended to influence the improper performance of a function or activity.

Corruption

The abuse of entrusted power for private gain, including conflicts of interest or inappropriate influence.

5. Prohibited Conduct

The following actions are strictly prohibited:

- Offering, soliciting, or accepting bribes or improper inducements
- Making false or misleading claims for expenses, grants, or payments
- Falsifying records, accounts, or documentation
- Misuse or misappropriation of organisational funds or assets
- Using organisational resources for unauthorised personal benefit
- Knowingly concealing or failing to report suspected fraud or bribery

6. Gifts and Hospitality

British Veteran Owned Ltd recognises that modest hospitality may arise in the course of legitimate business activity.

- Modest, proportionate, and transparent gifts or hospitality may be accepted
- Cash or cash-equivalent gifts must never be accepted
- Any gift or hospitality that could influence, or appear to influence, decision-making must be declined
- Gifts or hospitality with an estimated value exceeding £50 must be declared to the Chairman

7. Prevention and Proportional Controls

The organisation maintains proportionate financial and governance controls appropriate to its size and activities, which may include:

- Separation of financial duties where practicable
- Appropriate authorisation levels for payments
- Regular review of bank statements and financial records
- Verification of suppliers and contractors
- Periodic review of relevant policies and procedures

These controls may be reviewed and adapted as the organisation grows.

8. Reporting Concerns

Any individual who suspects fraud, bribery, or corruption is encouraged to report concerns promptly.

- Reports should be made to the Chairman
- Concerns may be raised in confidence
- No individual will suffer detriment for raising a genuine concern in good faith

Contact: chairman@britishveteranowned.co.uk

9. Investigation and Response

All reported concerns will be considered carefully and, where appropriate, investigated in a fair and proportionate manner.

Where evidence of fraud or bribery is identified, the organisation may take appropriate action, which may include disciplinary measures, termination of involvement, recovery of funds, and referral to relevant authorities.

10. Responsibilities

- The Board of Directors holds overall responsibility for this policy
- The Chairman is the designated lead for fraud and bribery matters
- All individuals covered by this policy are responsible for understanding and complying with it

Author:	Stephen Morgan	Approved By:	Stephen James
Position:	CEO	Position:	Chairman