



Fraud & Malpractice Policy

As Managing Director, I fully understand the prevalence of fraud, deception and malpractice in the commercial environment and the negative impact it could have on our business, clients, and stakeholders. Fraud or malpractice will not be tolerated in our operating environment. It is our expectation that all personnel shall act with complete integrity and safeguard the resources for which they are responsible. The purpose of this statement is to set out responsibilities regarding the prevention of fraud and malpractice.

The Bribery Act 2011 describes such actions as: 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.

It is my intention to develop and apply the following actions to:

- Development and maintenance of effective controls to prevent fraud;
- Taking appropriate legal and/or disciplinary action against perpetrators of fraud;
- Taking disciplinary action against all involved levels, where management failures have contributed to the commission of the fraud;
- Carrying out vigorous and prompt investigations should fraud be identified;
- Identifying the risks to which XANDER RECRUITMENT GROUP LTD systems and procedures are exposed;
- Developing and maintain effective controls to prevent and detect fraud;
- Ensuring controls are being applied.

All XANDER RECRUITMENT GROUP LTD personnel shall act with propriety in the use of official resources, when handling and utilising corporate funds, whether they are involved with cash or payments systems, receipts or dealing with contractors, suppliers, clients, and stakeholders.

Should personnel suspect a fraud has been committed or see any suspicious acts or events, they are required to report the details immediately to my Senior Management Team or directly to myself. Any instances of suspected fraud or malpractice reported, can be made with full anonymity and in the strictest of confidence. Details will be recorded, issues investigated and if necessary, acted upon in line with the company's Disciplinary Procedures and legislation as applied by the UK Law enforcement authorities.

Alex Stockley – Managing Director – XANDER RECRUITMENT GROUP LTD

Date: September 2026

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