

# Fraud Policy



In order to maintain our high standards, we have established procedures and controls to provide an environment which will minimise the opportunity for fraud. These procedures and controls have been developed within the **Commercial Development and Operating Process** which is underpinned by the **WYG Employment Deal** and other principles set out in our **Employee Handbook**.

In keeping with our **WYG Employment Deal**, the Board is not prepared to permit any employee to tarnish our hard-earned reputation through any type of malpractice and our **Whistleblowing Charter** has been developed to clarify how such issues should be reported and handled.

It should also be noted that we are committed to maintaining high standards of corporate governance throughout the Group which the Board sees as being critical, not only to business integrity and performance, but also to maintaining the confidence of investors and customers. The principles we have applied have been adopted from the UK Corporate Governance Code 2016 (**Code**) which sets out standards of good practice in relation to internal control, risk management and assurance. WYG applies the principles set out in the Code so far as reasonably practicable and appropriate for a public company of its size and complexity and in the light of the risks and challenges it faces.

One key element of our governance framework is independent assurance, which is provided primarily by Group Internal Audit, the independent external auditor and by other external advisers. Group Internal Audit provides assurance to the Board, the Audit & Risk Committee, and management that effective and efficient internal control processes are in place to identify and manage business risk across WYG.

If you identify or suspect some form of malpractice you should follow the escalation procedure set out in the **Whistleblowing Charter** to raise your concerns with management including, if necessary, the Chief Executive Officer, Chief Financial Officer, Group Internal Auditor or Company Secretary. They will decide the most appropriate method of investigation, normally involving the Group Internal Audit function to review potential internal control weaknesses and associated risk issues.

A handwritten signature in black ink, appearing to read 'Douglas McCormick'.

Douglas McCormick  
**Chief Executive Officer**

Title:	Fraud Policy		
Author/ Responsibility:	Company Secretary	Version:	2018/1
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