



Halcyon and Liber Limited is committed to preventing fraud and corruption from occurring and to developing an anti-fraud culture.

To achieve this, Halcyon and Liber Limited will comply with the requirements of Government Accounting to:

- Develop and maintain effective controls to prevent fraud;
- Ensure that if fraud occurs a vigorous and prompt investigation takes place;
- Take appropriate disciplinary and legal action in all cases, where justified;
- Review systems and procedures to prevent similar frauds;
- Investigate whether there has been a failure in supervision and take appropriate disciplinary action where supervisory failures occurred; and
- Record and report all discovered cases of fraud

Any member of staff who defaults on this policy shall receive an indefinite suspension or an outright dismissal.

Signed for and on behalf of the Management.