Fraud Prevention Procedures

(Economic Crime and Corporate Transparency Act 2023 – ECCTA)

1. Purpose and Commitment

WEINSULATE.CO.UK LIMITED is committed to preventing fraud and maintaining robust systems and controls to detect, deter, and respond to fraudulent activity.

We recognise our responsibilities under the **Economic Crime and Corporate Transparency Act 2023 (ECCTA)** and maintain **reasonable and proportionate procedures** designed to prevent fraud by employees, agents, subsidiaries, contractors, and other associated persons.

WEINSULATE.CO.UK LIMITED has a **zero-tolerance approach to fraud** in any form.

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2. Governance and Oversight

WEINSULATE.CO.UK LIMITED maintains clear governance arrangements for fraud prevention:

- Board-level oversight of fraud and financial crime risks
- Appointment of a Senior Responsible Officer (SRO) for fraud prevention
- Defined accountability across Finance, Procurement, Legal, Compliance, and Internal Audit
- Regular reporting of fraud risk and incidents to senior leadership and the Board

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3. Fraud Risk Assessment

A structured, risk-based approach is used to identify and assess fraud risks, including:

- Annual enterprise fraud risk assessment
- Procurement and supplier fraud risk reviews
- Financial transaction and payment risk analysis
- Third-party and intermediary risk evaluation
- Scenario analysis for emerging fraud typologies

Risk assessments are documented, reviewed periodically, and updated following material changes or incidents.

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4. Preventative Controls (Reasonable Procedures)

WEINSULATE.CO.UK LIMITED maintains proportionate internal controls to prevent fraud, including:

4.1 Segregation of Duties
Clear separation of responsibilities across:

- Supplier onboarding
- Purchase approval
- Invoice validation
- Payment authorisation
- Accounting and reconciliation

4.2 Procurement Controls

- Use of approved supplier lists
- Competitive tendering for defined spend thresholds
- Formal approval hierarchies for purchasing decisions
- Controls preventing single-person end-to-end procurement authority

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4.3 Financial Controls

- Purchase order and invoice matching
- Dual authorisation for payments above defined thresholds
- Bank account verification prior to payment or changes
- Monitoring of duplicate, split, or unusual transactions
- Restricted access to payment systems

4.4 Supplier and Third-Party Due Diligence

- Risk-based onboarding of suppliers and intermediaries
- Verification of identity, ownership, and legitimacy
- Screening for sanctions, adverse media, and fraud indicators
- Contractual obligations requiring ethical conduct and lawful practices

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5. Detection and Monitoring
Fraud risks are actively monitored through:

- Transaction monitoring and exception reporting
- Data analytics to identify anomalies or irregular patterns
- Internal audit reviews and spot checks
- Periodic supplier performance and compliance reviews
- Investigation of red flags and control breaches

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6. Reporting and Whistleblowing

WEINSULATE.CO.UK LIMITED maintains secure and confidential reporting mechanisms:

- Internal reporting channels (management, HR, compliance)
- Whistleblowing systems (including anonymous reporting where available)
- Clear escalation routes for suspected fraud
- Protection against retaliation for good-faith reporting

All concerns are treated seriously and investigated promptly.

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7. Investigation and Response
Where fraud is suspected or identified, the organisation will:

- Initiate a prompt and independent investigation
- Preserve relevant records and audit trails
- Suspend payments or relationships if necessary
- Report to regulators or law enforcement where legally required

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8. Training and Awareness
Fraud prevention training is provided to relevant personnel, including:

- Induction training for all employees
- Targeted training for procurement, finance, and high-risk roles
- Awareness of fraud typologies, red flags, and reporting duties
- Regular refresher training to reinforce controls and responsibilities

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9. Third-Party and Supplier Controls

WEINSULATE.CO.UK LIMITED requires that all relevant third parties:

- Comply with anti-fraud and ethical business standards
- Maintain accurate and transparent records
- Cooperate with audits and investigations
- Flow down equivalent obligations to subcontractors

Fraud risk considerations are embedded into supplier contracts and onboarding processes.

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10. Continuous Improvement

WEINSULATE.CO.UK LIMITED is committed to continuously improving its fraud prevention framework by:

- Reviewing fraud risks and controls annually
- Updating procedures in line with ECCTA guidance and enforcement developments
- Learning from incidents, near misses, and audit findings
- Enhancing systems, automation, and monitoring capabilities where appropriate

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11. Governance Statement

The Board of Directors has ultimate responsibility for oversight of fraud prevention arrangements. Operational responsibility is delegated to senior management, supported by compliance, legal, procurement, finance, and internal audit functions.

Signed: *E. Smith-Hutchon* Date:01/05/2026

Eric Smith-Hutchon
Director