




School of Coding & AI

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HIGHER EDUCATION

Anti-Fraud Policy

Policy Owner: Mandeep Athwal

Full Name	Position	Signature	Date	Review Cycle
Mandeep Athwal	CEO		01.09.2025	Annual



1. Policy Statement

School of Coding Limited has zero tolerance for fraud, corruption, or dishonesty. We are committed to protecting our resources, reputation, employees, learners, and stakeholders from the risks of fraudulent activity.

2. Purpose

This policy exists to:

- Prevent and detect fraud across all company activities.
- Provide clear procedures for reporting and investigating suspected fraud.
- Promote a culture of integrity, accountability, and transparency.

3. Scope

This policy applies to:

- All employees, directors, contractors, consultants, and volunteers.
- Any third party acting on behalf of School of Coding Limited.
- All activities, including finance, procurement, recruitment, teaching, and operations.

4. Definition of Fraud

Fraud is any deliberate act of deception intended to secure unlawful or unfair gain, including (but not limited to):

- Theft or misappropriation of money, assets, or intellectual property.
- False accounting or falsification of records.
- Bribery or corruption.
- Providing false information (e.g., CVs, invoices, reports).
- Abuse of position or authority for personal benefit

5. Responsibilities

- Board of Directors – oversee fraud prevention and response measures.
- Managers – implement controls, monitor risks, and raise awareness.
- All staff and contractors – comply with this policy and report suspicions.

6. Fraud Prevention

We will reduce the risk of fraud by:

- Maintaining strong internal financial and operational controls.
- Ensuring segregation of duties and approval processes.
- Conducting due diligence on employees, suppliers, and partners.
- Delivering fraud awareness training.
- Undertaking periodic risk assessments and audits.



7. Reporting Suspicions

- Concerns must be reported promptly to the Managing Director or Finance Manager.
- Alternatively, employees may raise concerns under the Whistleblowing Policy.
- Reports will be treated seriously, confidentially, and without victimisation.

8. Investigation

- Allegations will be assessed promptly and fairly.
- Investigations may involve internal auditors, external investigators, or the police.
- Evidence will be handled carefully to support potential legal action.

9. Disciplinary Action

- Proven fraud will be treated as gross misconduct.
- Sanctions may include dismissal, recovery of losses, and referral to law enforcement.

10. Monitoring & Review

- This policy will be reviewed annually by the Board of Directors.
- Fraud risks and controls will be continuously monitored.

Approved by: Manny Athwal

Date: September 2025