

## Annex J - Highways England's Anti-Fraud Code of Conduct



### Highways England's Anti-Fraud Code of Conduct

Highways England, working with its suppliers in good faith and in a spirit of mutual trust and respect, is committed to working fairly, honestly and with integrity and transparency. Highways England does not tolerate any form of fraud.

Fraud is a dishonest act, through false representation, failure to disclose information or abuse of position, with the intent of causing a gain for self, or loss to another.

Fraud does not necessarily result in direct or immediate financial benefit for the individual(s) committing fraud but may cause a loss and/or a negative reputational impact to another.

#### The Commitment

As a supplier to Highways England we confirm that we will meet the commitments set out below and will embed the principles throughout our supply chain.

1. We are committed to ensuring that our business operates with the utmost integrity.
2. We, and those employed by us, will not commit any fraudulent acts or carry out any of the following acts which could amount to fraud including, but not limited to:
  - Submission of false or inflated claims or invoices for payment or reimbursement;
  - Intentional distortion of financial statements or other records;
  - False or fraudulent financial reporting or making false or fictitious entries concerning accounts, equipment or supplies;
  - Forgery or alteration of any documents such as cheque, bank draft or any other financial documents including destruction or removal of records;
  - Impropriety in the handling or reporting of money or financial transactions;
  - Theft or misappropriation of assets or funds;
  - Disclosure of confidential information to third parties without authority for personal gain; and
  - The payment of excessive prices or fees where they are not justified.
3. We agree to:
  - Keep accurate and up to date records showing all payments made and received and all other advantages given and received and permit the Highways England to inspect those records as required; and
  - Immediately notify the Highways England of any breach of this Code.

Company name:

Representative's name:

Signature:

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Position:

Date:

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