

Preventing Corruption, Bribery, Fraud & the Facilitation of Tax Evasion: Policy Statement

1. Introduction

- 1.1 Corruption, bribery, fraud and the facilitation of tax evasion (collectively “fraud/bribery”) are never acceptable. They cause significant damage to organisations and are not victimless crimes. As well as squandering precious resources, they can damage public confidence and negatively impact the morale of employees, volunteers and supporters.
- 1.2 At the Canal and River Trust (“the Trust”) we take a “zero-tolerance approach” to fraud/bribery and are committed to complying with relevant legislation. We expect everyone who works for us to adhere to the highest standards of ethical behaviour and business practices. We want our employees, volunteers and other persons associated with us to be – and be seen to be – honest and incorruptible in their dealings. They must look after the resources in their care and follow our Standards.

2. Our approach

- 2.1 To help guard against fraud/bribery we will:
 - 2.1.1. raise awareness of the risks by providing appropriate training for employees & volunteers;
 - 2.1.2. wherever possible, design our systems and procedures to minimise the opportunity for fraud/bribery to occur;
 - 2.1.3. investigate any case of suspected fraud/bribery;
 - 2.1.4. take disciplinary, legal and/or other appropriate action against those found to have engaged in fraud/bribery, seeking recovery of losses where appropriate;



- 2.1.5.promote a culture of openness and accountability, identifying lessons learned from any cases of fraud/bribery and implementing appropriate changes;
- 2.1.6.regularly assess our fraud/bribery risks, review our preventative framework and monitor its effectiveness;
- 2.1.7.encourage employees and volunteers to report reasonably held suspicions in good faith, and without recrimination;
- 2.1.8.treat the following as disciplinary matters:
 - harassment or victimisation of a person who has raised a concern in good faith;
 - deliberately deterring others from reporting concerns;
 - deliberate abuse of this process by maliciously raising allegations against others;
 - retaliation against an individual who has refused to act in breach of our associated Standards.

3. Our expectations

- 3.1 We expect our employees, volunteers, agents and other persons who perform services for or on behalf of the Trust:
 - 3.1.1. Not to engage in or facilitate fraud or tax evasion;
 - 3.1.2. Not to misuse their office or power for private gain;
 - 3.1.3. Not to offer, promise, give, solicit or accept bribes, facilitation payments or “kickbacks”;
 - 3.1.4. Not to offer, promise or give any advantage to a foreign government official with the intention of influencing their conduct as an official;
 - 3.1.5. Not to accept a donation, loan or other material support that is offered to the Trust where they would derive personal benefit (individually or collectively);
 - 3.1.6. Not to accept any gift or offer of hospitality which could – or which another person could reasonably believe may - influence any decision they make;

3.1.7. To declare any interests (whether personal interests or those of a family member or close associate) which may prejudice their ability to act honestly and fairly;

3.1.8. Not to accept or offer gifts or hospitality other than in accordance with our Corruption, Bribery, Gifts and Hospitality Standard;

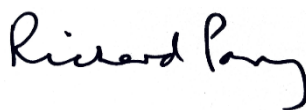
3.1.9. To report any suspicions they may have of fraud/bribery without delay, either to the Trust's Chief Financial Officer, its Legal & Governance Director or via the independent whistleblowing provider AAB People¹;

3.1.10. To adhere to the requirements of our Fraud and Facilitation of Tax Evasion Standard and our Corruption, Bribery, Gifts and Hospitality Standard.



David Orr CBE

Chair to the Board of Trustees



Richard Parry

Chief Executive

March 2025

¹ AAB People can be contacted [online](#), via [email](#) or by phone (0800 988 6818)