Financial Regulations

Rural Stirling Housing Association, Stirling Road, Doune, FK16 6AA Registered as a Scottish Charity No. SC037849	
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Contents

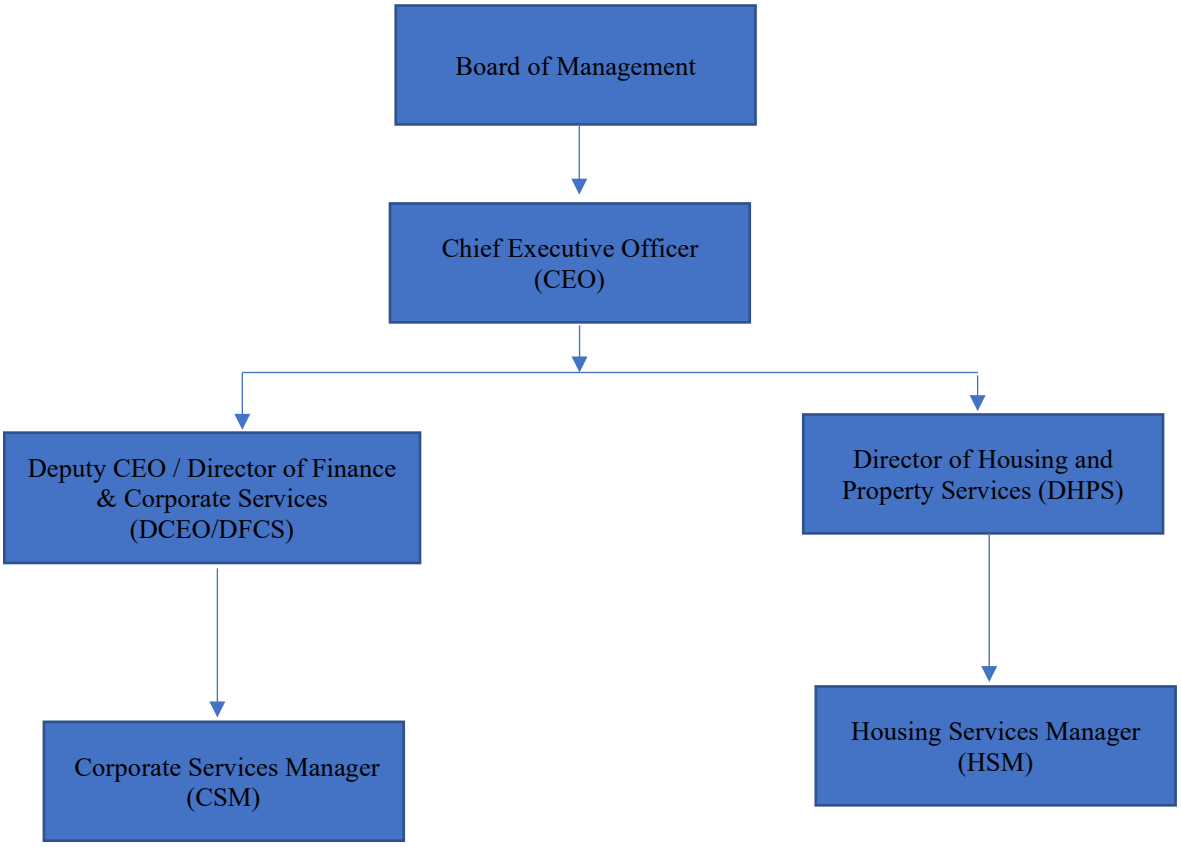
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1. INTRODUCTION

1.1 RSHA must demonstrate effective governance and sound financial management and must have a robust policy and procedural framework that complies with legislation, guidance and good practice.

1.2 Rural Stirling Housing Association's financial regulations are based on the following current management structure: -



1.3 RSHA currently operates under Rules which are based on the latest version of the SFHA Charitable Model Rules (Scotland). This is the constitution of the organisation.

1.4 The standing orders of RSHA detail how the business of the organisation shall be run and include responsibilities, powers and remits of each Board or Committee and respective Board and staff responsibilities (set down within the Schedule of Delegated Authority).

1.5 The financial regulations set down generally accepted best practice in relation to financial management. They form a part of the overall system of financial and management control and take account of the Scottish Housing Regulator's (SHR) Standards of Governance and Financial Management.

1.6 Compliance with the financial regulations is compulsory for all staff. It is the responsibility of the Senior Management Team to ensure that all staff are aware of the existence and content of these regulations.

1.7 The financial procedures set out how these regulations shall be implemented.

1.8 A review of the Regulations shall take place at least every 3 years.

2. BOARD OF MANAGEMENT RESPONSIBILITIES

2.1 The Board of Management has ultimate responsibility for all aspects of RSHA's affairs.

2.2 Statute requires the Board of Management to prepare financial statements for each financial year and it is the Board of Management which is responsible for keeping proper accounting records which disclose with reasonable accuracy at any time the financial position of RSHA.

2.3 The Board of Management is also responsible for safeguarding the assets of the organisation and for taking reasonable steps to prevent and detect fraud and other irregularities.

2.4 Board members also have a duty towards RSHA, its staff, tenants of Rural Stirling Housing Association and the communities within which RSHA operates. They must therefore satisfy themselves that they receive all necessary information to make appropriate decisions.

3. STAFF RESPONSIBILITIES

3.1 The Chief Executive Officer (CEO) is responsible to the Board of Management for the promotion of RSHA and for line managing and co-ordinating the activities of the other senior staff. The CEO is also responsible for the implementation of policy and procedural decisions taken by the Board of Management.

3.2 Each senior staff member is responsible for the accountability and control of staff members within their section and for the security and control of all assets, cash and materials relating to that responsibility.

3.3 The responsibilities and duties of all staff members shall be contained within a suitable job description. The responsibilities and duties of any agents are contained within the relevant Minute (s) of Agreement or contracts as appropriate.

4. ACCOUNTING

4.1 All accounting procedures of RSHA shall be determined by RSHA's Deputy CEO/ Director of Finance & Corporate Services (DCEO/DFCS) in consultation with the CEO. These procedures must take account of statute, good practice and current guidance.

4.2 The format of RSHA's financial records shall be determined by the DCEO/DFCS in consultation with the CEO and must take account of audit requirements, good practice and current guidance.

4.3 The allocation of accounting duties should, where possible, take account of segregation of duties and records should be regularly updated.

4.4 All accounting policies of RSHA shall be contained within the annual financial statements and shall be reviewed annually.

5. AUDIT REQUIREMENTS

5.1 The role of the external auditors must be clearly detailed in an Engagement Letter that shall be reviewed every three years in accordance with good practice. Preparation of the financial statements shall be undertaken by the DCEO/DFCS and a Summary Audit Report must be received annually by the Board of Management for consideration and response. In accordance with good practice RSHA shall review its external auditors at least every six years unless the service level dictates otherwise.

5.2 A year end timetable should be completed by the DCEO/DFCS and be agreed with the external auditors prior to commencement of the year end statutory audit.

5.3 Audited financial statements require approval by the Board of Management and must be submitted to the SHR and lenders within 6 months of the financial year end, along with a copy of the auditor's Summary Audit Report and the Board of Management's response to the Summary Audit Report. These accounts must be in the required format and contain the report of the external auditors. In addition, the financial statements must contain a report from the Board of Management, to include comment on past and planned developments, together with a separate Board of Management report on the systems of internal financial control.

5.4 Following approval of the Audited Financial Statements RSHA shall submit returns to the Financial Conduct Authority, Office of Scottish Charity Regulator, and Scottish Housing Regulator in line with prescribed timescales.

5.5 The internal and external audit functions shall be overseen by the Board of Management.

5.6 The Board of Management is responsible for RSHA's system of internal financial control and it is acknowledged that an appropriate internal audit system shall provide all relevant stakeholders with assurances on the internal controls operated by RSHA. It is also recognised that any system can only provide reasonable and not absolute assurance against misstatement or loss.

5.7 A rolling programme for internal audit shall be agreed by the Audit and Risk Committee and this shall take account of recommendations from the CEO and DCO/DFCS. The agreed programme shall incorporate normal day-to-day business risks

as well as, where practical, areas of major risk if deemed appropriate by the Audit and Risk Committee.

5.8 The Audit and Risk Committee shall report formally to the Board of Management on all relevant aspects of internal and external audit, in accordance with its remit set down within Standing Orders.

5.9 RSHA's CEO or DCEO/DFCS have authority to access all records, documents, correspondence and cash sums for verification purposes. Any event involving or thought to involve fraud or irregularities or malpractice shall be notified to the CEO, Chair or Secretary of RSHA immediately for further investigation and action.

5.10 To assist the Board of Management in reviewing the adequacy and effectiveness of RSHA's internal control systems RSHA shall procure internal audit services from an external provider. Tenders for this service will be sought at least every five years with the auditor's performance being reviewed annually by the Audit and Risk Committee.

5.11 The internal auditor (IA) will review existing systems, controls and procedures to ensure that they are efficient and effective and that they are amended in accordance with changing circumstances and that they are adhered to in practice. The IA will also recommend improvements in the event that any weaknesses have been identified.

5.12 The IA may be asked to participate in discussions relating to the formulation and installation of new systems, controls and procedures.

5.13 The IA may assist in the protection of the assets of RSHA by carrying out regular reviews of operations in order to detect system weaknesses, inefficiencies, fraud, misappropriation and losses due to waste or maladministration.

5.14 The IA will also monitor compliance with RSHA's Financial Regulations and Procedures.

5.15 When reviewing any area or system, the IA will have authority to enter, at all reasonable times, RSHA's premises and have access to, with power to remove, if necessary, all records, documents and correspondence relative to any subject being examined.

5.16 The IA will require and receive any explanations as necessary concerning any matter being investigated and obtain the co-operation of any employee of RSHA in such investigations.

5.17 The IA will require any employee of RSHA to physically verify cash or any other property belonging to RSHA upon demand.

5.18 Copies of all internal audit reports, including recommendations and responses shall be forwarded to RSHA's external auditors.

6. FRAUD BRIBERY AND ERRORS

6.1 The primary responsibility for the prevention and detection of fraud and errors rests with the Board of Management however the review and monitoring of controls and detailed scrutiny, where appropriate, is delegated to the Audit and Risk Committee. The external auditor may plan their audit in order to have a reasonable expectation of detecting material misstatements in the financial statements, whether caused by fraud or errors.

6.2 To assist in discharging its responsibilities in this area the Audit and Risk Committee should receive reports from the IA on all cases of actual or attempted fraud or bribery and consider whether internal controls require to be reviewed. A report should be made to the Board of Management providing the details of the case, whether actual or attempted fraud and bribery, along with the learning outcomes and details of any change required to controls.

6.3 Any matters arising which involve irregularities concerning cash, credit card use, property or the operations of RSHA shall be investigated thoroughly by one or more of the Senior Management Team or auditors. The involvement of the Police shall be decided upon by the CEO/Chairperson. RSHA will encourage any staff member to report any irregularities to the CEO or Chairperson as outlined in RSHA's Whistleblowing Policy.

6.4 RSHA will maintain a register of all incidents of actual or attempted fraud or bribery. The register will be annually reviewed by the Board of Management and signed by the Chairperson. It will be open at all times to the SHR and to the internal and external auditors.

6.5 The CEO or Chairperson will report any issue involving irregularities in RSHA's activities to the Board of Management and to the SHR, if required, as a notifiable event.

7. BUSINESS PLANNING

7.1 The CEO is responsible for the preparation of an annual business plans on behalf of RSHA. The Board of Management is ultimately responsible for the governance and direction of RSHA and it is recognised that the business plan should represent a joint understanding of what the organisation wants to achieve, the choices available and the key risks faced.

7.2 The content of the business plan shall reflect written Guidance from the SHR, and include such items as:

- Strategic objectives
- Risk assessment
- Operational targets
- Environmental analysis
- Asset management and housing stock plans

- Financial forecasts
- Scenario planning

7.3 A detailed Strategic Plan for RSHA shall be produced every five years (including a comprehensive review of the strategic direction) and annually reviewed. On a quarterly basis progress with operational plans shall be reported on to the Board of Management.

7.4 The CEO shall produce an annual timetable to accompany the business planning process detailing the stages, processes and responsibilities in order to achieve the timetable.

7.5 RSHA shall take account of the SHR Business Planning advisory guidance in its business planning process

8. APPROACH TO FINANCIAL FORECASTING

8.1 The DCEO/DFCS is responsible for long-term financial planning on behalf of RSHA.

8.2 Long-term financial forecasts shall be prepared in accordance with timescales noted at clause 9.7 and shall be forwarded to all lenders, as required within the loan agreements, as well as external and internal auditors for information and consideration.

8.3 The content of the financial forecasts shall include the following information as a minimum:

- Details of main assumptions employed and source;
- Income and Expenditure Accounts for 30 years;
- Balance Sheet projections for 30 years;
- Key performance indicators data and peer comparisons;
- Covenant compliance schedules;
- Appropriate sensitivity analysis;
- Schedules for all income and cost information and assumptions;
- Supporting narrative to confirm an overview of the projected outturns, any areas for further consideration, any areas of concern and any actions required that flow from production of the final information.

8.4 While the overall responsibility for this information lies with the DCEO/DFCS it is essential that there is an appropriate input into the long-term financial plans from all senior staff. In particular, the areas of rent levels, rent increases, maintenance costs, staffing levels and costs, and future development activity require agreed input.

8.5 Given the impact that inflation and interest rates may have on the expected financial position, the DCEO/DFCS shall seek information from lenders regarding future expected rates for these areas. In addition any real cost increase assumptions should take account of lender and valuer advice.

8.6 The DCEO/DFCS shall produce an annual timetable to accompany the financial forecasting process and this shall take account of:

- Provision of, review and agreement on future maintenance plans;
- Provision of, review and agreement on rental, staffing and development assumptions;
- Production of draft projections;
- Management team discussion, review and agreement of draft projections;
- Reporting to Board of Management;
- Provision of information to external parties;
- Feedback to Board of Management from external parties.

8.7 The importance of financial forecasting in relation to RSHA's overall business planning process is recognised and timetables applicable to both processes require to be carefully aligned.

9. BUDGETING

9.1 An annual budget must be approved by the Board of Management of RSHA prior to the start of the financial year to which it relates. This budget must be accompanied by a statement of main assumptions, projected Income/Expenditure Account and Balance Sheet, cash flow projections, monthly income and expenditure details, cost allocation information, appropriate ratio analysis, loan covenant performance and a summary commentary.

9.2 The budget shall be regarded as the basis for authority to incur expenditure. It should be recognised that changes in circumstances may result in budgeted expenditure not reflecting actual spend required. The authorisation of any additional expenditure required will be subject to the parameters detailed within the Standing Orders, Schedule of Delegated Authority (Section 2b) Expenditure out-with budget. All expenditure out-with budget must be reported to the next Board of Management meeting.

9.3 Whilst the overall responsibility for the budget rest with the Board of Management, the DCEO/DFCS, in conjunction with the CEO, will lead on the preparation of the draft budget. It is essential that there is an appropriate input into the budget from all senior staff, who will be included in the process. In particular, the areas of rent levels, rent increases, maintenance costs, staffing levels and costs, and future development activity require agreed input.

9.4 The Budget Holders have responsibility to ensure that actual expenditure incurred is within the limits, as set by the approved budget and within the scope of their authority, as set out in the Schedule of Delegation. Budget holders will be provided with regular financial reports to assist them in the management and control of their budgets.

9.5 On a quarterly basis the DCEO/DFCS shall prepare Management Accounts for RSHA which shall compare actual results to date (from the books of account) with the estimates contained within the budget. Material variances must be clearly explained within the narrative supporting the Management Accounts. In addition, the effect of likely future events on the financial position should be contained within the quarterly management accounts together with details of the currently projected financial position of RSHA at the year-end. A copy of the approved budget and quarterly management accounts will be sent to RSHA's lender(s) and external auditors.

9.6 In circumstances of emergency, expenditure may be incurred beyond authorisation levels in accordance with the guidelines in the Standing Orders, Schedule of Delegated Authority (Section 2 b) Expenditure out-with budget. Any such expenditure must be reported by the CEO to the next meeting of the Board of Management.

9.7 Senior staff should ensure that when reports are issued to the Board of Management, the financial implications of any course of action should be fully detailed. The DCEO/DFCS should be consulted prior to any report that has material financial implications going to the Board of Management.

9.8 RSHA is required to prepare and submit 5-year financial projections to the SHR in the prescribed format and within the relevant timescales all in accordance with existing guidance from the SHR. A copy of this information shall be submitted to lenders and external auditors.

9.9 RSHA shall undertake a review of its long-term projections on an annual basis in order to ensure that the projected annual position remains on target with the 30-year cash-flow projections. A full and detailed business plan review shall be undertaken every five years and more often where circumstances (including loan agreement terms and conditions) dictate that an earlier review is necessary. Appropriate sensitivity analysis must be applied to the long-term projections with details being incorporated into the business plan document.

10. CASH CONTROLS INCLUDING CREDIT CARD USE

10.1 Bank accounts held by RSHA and cheque signing and other arrangements for payment (including BACs) are contained within RSHA's detailed financial procedures. Details of those authorised to commit and authorise expenditure and payments are set down within the Standing Orders, Schedule of Delegated Authority.

10.2 Procedures for the receipt of funds are detailed in the financial procedures.

10.3 Petty cash procedures are detailed in RSHA's financial procedures.

10.4 All bank accounts must be reconciled to the relevant books of account by the Finance Officer (FO) on a monthly basis. These reconciliations shall be reviewed and certified as accurate by the DCEO/DFCS.

10.5 The FO shall make arrangements for the safe custody of all banking documents including cheques. This can be delegated to other support staff during periods of absence.

10.6 The use of company credit cards by employees must adhere to the Company Credit Card Policy.

11. DEBTORS CONTROLS

11.1 RSHA acknowledges the requirement to maximise income collection in order to generate as much income as possible via interest receipts.

11.2 Where external funding for projects is made available to RSHA all grant claims must be submitted timeously in order to ensure receipt of funds prior to payment (where allowed) or as soon as possible (in line with grant offer conditions) after payment has been made.

11.3 Rental income payments are the main source of revenue income for RSHA and operational procedures shall be reviewed regularly in order to monitor their effectiveness. A quarterly report on rental information shall be prepared by the Housing Services Manager and submitted to the Board of Management.

11.4 Factoring accounts shall be issued timeously in accordance with the Factoring Policy and a quarterly report by the DCEO/DFCS shall be presented to the Board of Management.

11.5 All other sums due and outstanding to RSHA shall be summarised within the quarterly management accounts. Such sums shall include insurance claims outstanding, chargeable repairs and improvement works for owners.

11.6 Procedures relating to rents, factoring and other income generating areas shall incorporate information on debtor control including the basis for monitoring and reporting sums due.

11.7 All amounts written-off as irrecoverable must be formally reported on and approved by the Board of Management in line with Schedule of Delegation.

11.8 Responsibility for Debtors control within RSHA is as follows: -

(i) Rent Arrears - Housing Services Manager
(ii) Factoring Arrears – Housing Services Manager
(iii) Insurance Claims outstanding – DCEO/DFCS
(iv) Rechargeable Repairs – Housing Services Manager
(v) Improvements Works for Owners – Housing Services Manager
(vi) Wider Action Claims outstanding – Chief Executive Officer
(vii) All other sums due – Chief Executive Officer, DCEO/DFCS.

12. ASSET CONTROLS

12.1 RSHA shall maintain a fixed asset register detailing all furniture, fittings and equipment owned by the organisation. The register should detail acquisition date, disposal date, estimated useful life for depreciation purposes and cost. In addition, copies of invoices relating to each asset purchased shall be retained with the register, which may be held in electronic format.

12.2 RSHA shall undertake quarterly reviews of the register to verify continued ownership and existence of these fixed assets. This task shall be undertaken by the FO with the DCEO/DFCS carrying out an annual review.

12.3 Equipment Maintenance contracts and leasing contracts shall be entered into for such fixed assets as appropriate and a separate register shall be held by RSHA. Details to be inserted on these registers include service provider, start date, termination date, and asset being maintained/leased and cost. This register shall be updated on a quarterly basis by the FO and may be held in an electronic format.

12.4 Details of any asset/equipment disposals, including details of sums received (if applicable), shall be reported to Board.

13. CONTRACTS/TENDERING

13.1 All contracts entered into by RSHA require authorisation and signature in line with expenditure type as detailed in the Schedule of Delegated Authority.

13.2 Material variations to contracts will require authorisation in accordance with Standing Orders, Schedule of Delegated Authority.

13.3 The anticipated contract sum will dictate the method of procurement and all staff should refer to the Group Policy for the Sustainable Procurement of Goods, Services and Works before commencing the procurement journey.

13.4 RSHA shall take account of current Scottish and UK Procurement thresholds and also comply with the requirements of the Public Contracts (Scotland) Regulations 2015 and the Procurement Reform (Scotland) Act 2014 as appropriate.

14. BOOKS, REGISTERS AND COMPUTER DATA

14.1 As a minimum requirement the following books and registers must be maintained by RSHA: -

	Books and Registers	**Responsible Staff Member**
	(a) Cashbook	Finance Officer
	(b) Petty Cash Book	Finance Officer
	(c) Nominal Ledger	Finance Officer
	(d) Fixed Assets Register	Finance Officer

	(e)	Office Inventory	Assistant Corporate Services Officer
	(f)	Register of Disposals	Chief Executive Officer
	(g)	Register of Frauds and Bribery	Chief Executive Officer
	(h)	Register of Payments and Benefits	Corporate Services Manager
	(i)	Register of Interests	Corporate Services Manager
	(j)	Register of Members	Corporate Services Manager
	(k)	Register of Gifts & Hospitality	Corporate Services Officer
	(l)	Complaints register	Corporate Services Manager
	(m)	Tender Register	Chief Executive Officer
	(n)	Seal Register	Corporate Services Manager
	(o)	Rent Ledger	Housing Services Officers
	(p)	Contracts Register	Director of Housing and Property Services
	(q)	Risk Register	Deputy Chief Executive Officer/Director of Finance and Corporate Services

14.2 Responsible staff member refers to the individual having responsibility for maintenance of and administration relating to each register.

14.3 All such books and registers together with other relevant papers or information may, where appropriate, be kept in an electronic format and must be securely stored when not in use.

14.4 All information held, in any format, must comply with RSHA's Information Security Policy.

14.5 In conducting its operations RSHA must comply with all aspects of current data protection legislation (Data Protection Act 2018, Data (Use and Access) Act 2025). All such matters are the responsibility of the Senior Management Team. All staff members should adhere to RSHA's Data Protection Policy.

14.6 RSHA's Information Technology function is outsourced. This contract is overseen by the DCEO/DFCS.

15. SECURITY

15.1 Each senior staff member is responsible for maintaining proper and adequate security at all times for furniture, equipment, cash and other assets under their control. The CEO is responsible for overall security and any risks to RSHA must be notified to the CEO immediately.

15.2 Current staff members are all office key holders. RSHA's cleaning contractor will also have a set of office keys.

15.3 The Finance and Corporate Services Adviser (FCSA) has day-to-day responsibility for petty cash payments. The FO will reconcile the petty cash on a monthly basis. In the

absence of the FO, another member of the Finance and Corporate Services Team will assume responsibility for petty cash payments.

15.4 The amount of petty cash held at any one time should not exceed £500.

15.5 The limit for each petty cash transaction is £100 maximum.

15.6 The petty cash box is locked and held in a locked cabinet. The petty cash box key is held in the secure key cabinet. Only members of the Finance and Corporate Services Team shall have access to the keys to the cabinet/petty cash box. Access to the safe and petty cash box is restricted to the aforementioned staff members and in all cases safe keys must be retained in the possession of the authorised staff member who, under no circumstances, should leave keys unattended.

15.7 All staff with access to the main office safe are required to ensure that the safe is locked and secure at all times.

15.7 The loss of office, property or petty cash keys must be notified to the CEO immediately.

16. INSURANCES

16.1 The DCEO/DFCS shall instruct all insurance cover on behalf of RSHA subject to consultation with the Senior Management Team regarding cover requirements.

16.2 The Senior Management Team shall advise the DCEO/DFCS of events likely to result in a change to RSHA's insurance requirements.

16.3 The DCEO/DFCS, in consultation with the Senior Management Team, shall review all insurances during the year and report to the Board of Management thereon.

16.4 The submission of all insurance claims is the responsibility of the appropriate senior staff member depending on the claim type.

16.5 The Employer's Liability Insurance Certificate will be displayed in the public reception area for each place of business.

17. RISK MANAGEMENT

17.1 RSHA's approach to managing risk is detailed within the Risk Management Policy and Strategy.

17.2 The CEO will report to the Board of Management regarding risks and progress in mitigating them, as per the Standing Orders.

18. VALUE FOR MONEY

18.1 RSHA shall seek to obtain value for money in terms of its fixed asset investments, its contractual commitments and in its day-to-day operational activities. RSHA's Value For Money Statement sets out it's approach.

18.2 The selection of an appropriate method of procurement, the use of tendering procedures, the selection of appropriate financing options, a balancing of quality and cost or other appropriate cost benefit analysis shall be undertaken by RSHA in its decision making process.

19. TREASURY MANAGEMENT

19.1 All investment of funds or arrangements for seeking and managing private finance shall be undertaken in accordance with RSHA's Treasury Management Policy.

20. TRAVEL, SUBSISTENCE & OTHER ALLOWANCES

20.1 All claims for payment of car allowances, subsistence allowances, travelling and incidental expenses shall be authorised and paid in accordance with RSHA's Terms of Employment, policies and procedures on Board Members' and Staff Expenses and in line with the Schedule of Delegated Authority.

21. GIFTS, HOSPITALITY & INTERESTS

21.1 The giving and receiving of gifts and hospitality shall be in accordance with RSHA's Entitlements, Payments and Benefits Policy.

21.2 All Board members and staff shall ensure that they declare any interest with regards to any aspect of RSHA's activities as required by RSHA's rules and regulatory requirements.

22. DONATIONS

22.1 RSHA's approach to donations is detailed within the Group Community Donations Fund Policy

23. BENCHMARKING AND PERFORMANCE ANALYSIS

23.1 The CEO shall ensure that reports will be submitted to the Board of Management on the following areas:

(a) Analysis of Business Plan targets achieved
(b) Comparison of results with SHR published ratios and statistics
(c) Comparison of results with Association's annual budget
(d) Comparison of actual and estimated loan covenant results.
(e) Annual Return on the Charter (ARC)

23.2 RSHA's Board of Management may consider issues arising from the above in greater detail.

23.3 With reference to the above, each senior staff member is responsible for the provision of information relating to their department in line with an agreed timetable confirmed by the CEO and included within operational plans. When providing relevant data or statistics summaries senior staff shall email the detailed calculations or file attachments that represent the source of the summary data or statistics provided. The CEO or a delegated representative shall audit relevant information provided in order to ensure accuracy and consistency of reporting.

24. EXPENDITURE AUTHORISATIONS

24.1 The Board of Management approves budgets prior to the beginning of the financial year and staff have delegated authority to spend within these budgets in accordance with the Standing Orders, Schedule of Delegated Authority.

24.2 In addition, staff have authority to spend within agreed Scottish Government, local Council or other relevant authority's approvals on development and capital expenditure.

24.3 There are three levels of procedures involved in authorising expenditure.

a) taking on the commitment to spend
b) certification that the expenditure is arithmetically correct
c) approving the invoice after goods or services received

24.4 Detailed arrangements regarding these are set down within RSHA's Financial Procedures.

25. RELATED DOCUMENTS

- Treasury Management Policy
- Standing Orders
- Schedule of Delegation
- Entitlements, Payments and Benefits Policy
- Group Whistleblowing Policy
- Information Security Policy
- Data Retention Policy
- Board Members and Staff Expenses Policy
- Group Community Donation Fund Policy
- Sustainable Procurement Policy
- Company Credit Card Policy
- Factoring Policy
- Anti-Fraud and Bribery Policy
- Funds Transfer Policy
- Value For Money Statement

Please sign below that you have read and understood the Financial Regulations Policy approved 15 October 2026.

1. _____ Date: _____

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