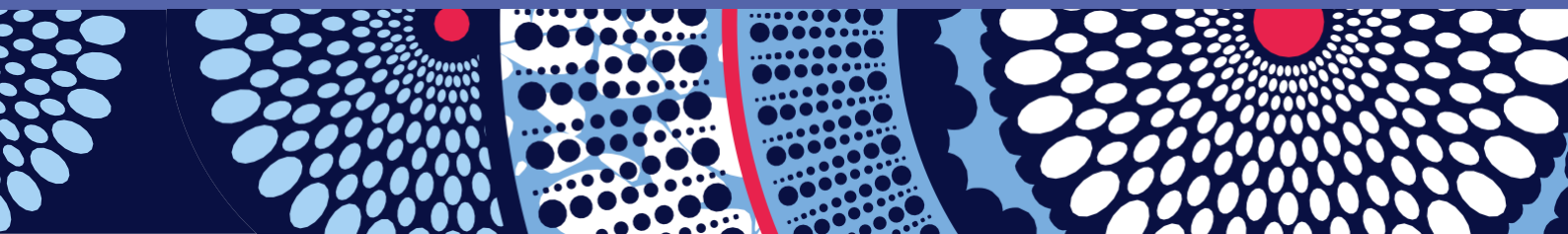


JUNE 2023

# FRAUD MANAGEMENT POLICY

(the 'Policy')



## GLOSSARY

**Business Partner:** means a third party with whom the Company has an investment or business arrangement.

**Company:** means any of the following companies:

- **AXIAN Telecom Cluster:** AXIAN Telecom, Telma, Telco Comoros, TRM, Free Senegal, Honora Tanzania Plc (fka MIC Tanzania), Togocom, Connecteo, Towerco of Africa Ltd (TOA), Towerco of Africa DRC, Towerco of Madagascar, Towerco of Africa Tanzania Limited, Stellar-IX Tanzania Limited and any other affiliate
- **AXIAN Energy Cluster:** AXIAN Energy, AXIAN Energy Green, JOVENA, New Energy Africa (NEA), NEA Madagascar, WeLight, CGHV, GES, and any other affiliate;
- **Open Innovation & Fintech Cluster:** MVola, Telco Money, Free Money, TMoney, HTMSL (*Tigo Pesa*), Nexta, Pulse and any other affiliate;
- **Real Estate Cluster:** First Immo, SGEM and any other affiliate;
- **Financial Services Cluster:** BNI Madagascar, Sanko and any other affiliate;
- **AXIAN Support Services;** and
- **Any other entity that is part of the current or future organizational structure of the Group, either by way of incorporation, merger or acquisition, joint venture, among others.**

Collectively referred as the 'Companies' or the 'Group'

**Confidential Information:** includes, without limitation, all business-related strategic documents prepared by, owned by the Company, or related to the Group as well as all personal information held on third parties, including Employees.

**Employee:** means any person hired by a Company of the Group and working full time, part time or on a casual basis, including interns and contracted staff, as well as its senior management officials and directors.

**Ethics:** refers to a behavior that is based on morality, seriousness, honesty and Respect for all applicable rules and guidelines set out by the Group.

**Ethics Line:** refers to the Group's ultimate reporting line with the mandate to undertake a high-level investigation on complex matters, which may not be resolved by the Local Compliance Officer/Champion. Matters shall be escalated to the Ethics Line through the Axian Speak Up platform.

**Group:** means all the Companies.

**Integrity:** means a behavior of honesty and absolute probity, without any ill intent and seeking the best interests of the Group.

**Investigation:** means a process designed to gather and analyse information in order to determine whether an act of fraud, corruption, or other misconduct has occurred and if so, identify the party or parties responsible.

**Investigator:** refers to the person(s) who shall, relative to the nature and complexity of a reported case, be mandated by the Company's Ethics Line to carry out a formal inquiry and advise on how to remediate the situation. The designated Investigator may be someone holding relevant competencies and expertise within the Group or an external party, for instance a licensed legal practitioner, fraud examiner or auditor.

**Professional Conduct:** means a set of ethical rules and duties that govern a professional activity. It defines the conduct of those practicing the activity, the relationships between them, with their clients, and with the public.

**Respect:** means consideration of the value of someone or something; treating others with Respect and consideration, and not harming them physically or psychologically.

**Responsibility:** refers to moral, intellectual and professional necessity to carry out and meet one's obligations and commitments.

**Senior Management:** refers to the appointees of the Company who are at the highest level of management and who have control over the day-to-day operations of the Company.

**Values:** refers to the attributes defined and adopted by the Company to which the Employees must adhere. Defined Values shall be the reference points which shall guide the Employees in their daily work. The Company's Values include Boldness, Passion, Innovation and Commitment

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# 1 DEFINITION OF FRAUD

Fraud is any activity that relies on deception in order to secure an unfair or unlawful gain, which may not necessarily be of financial nature, over another person. Fraud becomes a crime when it is a “knowing misrepresentation of the truth or concealment of a material fact to induce another to act to his or her detriment”. Words that are commonly used to describe fraud include scam, con, swindling, extortion, cheat, ploy, double-cross, deceit.

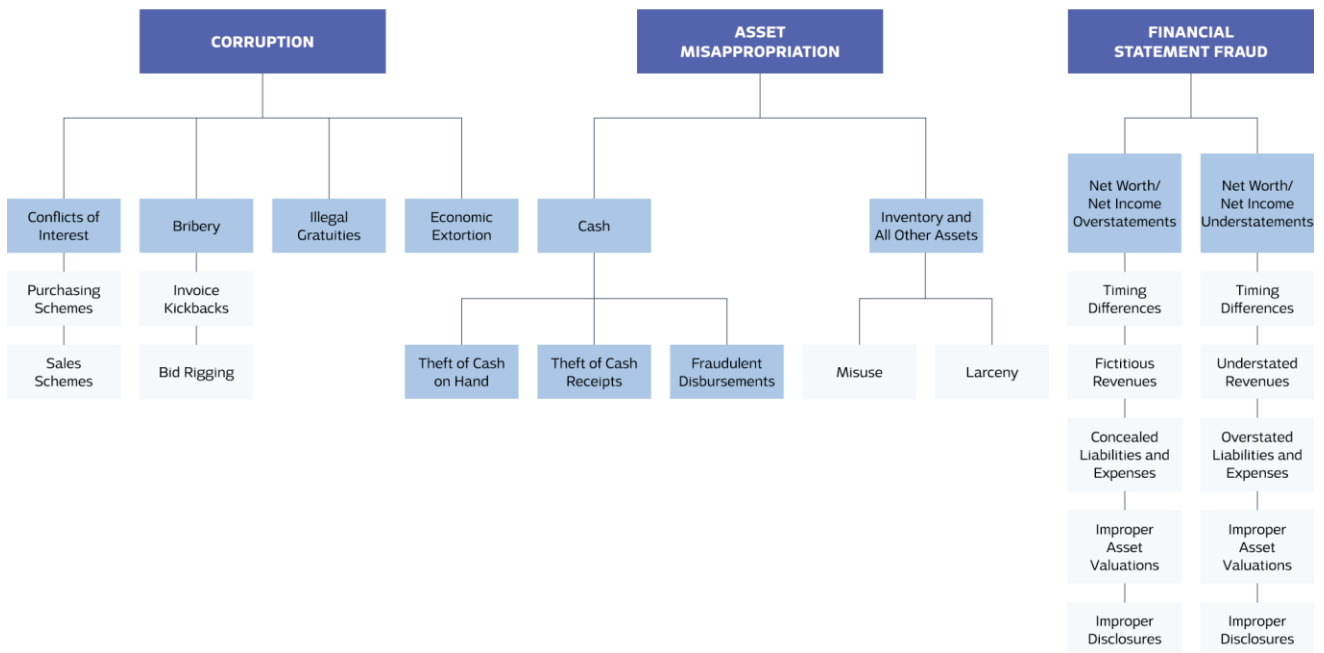
While any act of fraud is to be condemned by the Company because of major collaterals that it might have to face, there is a need for a well-defined set of protocols to which the Employees must comply with.

Fraud is an ever-present threat to any operator or service provider and hence must be a concern of all Employees, being the front liners and first line of defence. They are hereby expected to preach a high level of professionalism and ethical conduct while acting or processing transactions for or on behalf of the Company. They must always act honestly and with integrity and to safeguard the resources for which they are responsible.

An indicative list of actions or intended actions of an Employee from any business unit and hierarchical level within the Company, which may potentially be regarded as a fraudulent activity is provided below:

- Case of forgery or alteration or deletion of the Company’s documents and/or records;
- Misappropriation or use of the Company’s funds and assets for personal gain;
- Impropriety in the handling of money or financial transactions, including fictitious operations, imaginary credit;
- Using position held within the Company for gratification;
- Theft or misuse of the Company’s property, services and Confidential Information;
- Unauthorised disclosure of Confidential Information to external parties;
- Offering or accepting bribe for personal gain;
- Knowingly generating or paying false claims or invoices;
- Conspiring or assisting in the commitment of an illegal activity (including money laundering or terrorism financing or proliferation).

The fraud tree concept below issued by the Association of Certified Fraud Examiners (ACFE) provides in a more comprehensive way categories of occupational fraud and abuse classification system:



## 2 PURPOSE

Fraud risk is always a matter of concern and requires significant consideration by the top-level management officials for its potentially devastating effect, not limited to financial losses and other long-term business repercussions.

While any alleged case of fraud must be properly assessed and evaluated in view of decision making, this Policy outlines the internal procedures, centered around fraud prevention, monitoring and reporting, to be adopted by the Employees.

For the instauration of an effective anti-fraud culture within the Company, it is important for the Employees to understand what the problem is, how they may be faced to such a situation and what should be done in case of such an act shall be detected. For this reason, aligned to the Company's zero tolerance approach, this Policy sets forth the Company's anti-fraud strategy with emphasis the prevention, detection, reporting and investigation procedures.

As sanction, provisions have been made for disciplinary and legal actions against the defaulters with the possibility to terminate employment, seek legal recourse for compensation in respect to loss suffered and/or enter a formal case against the defaulters before the competent authorities and court.

## 3 FRAUD MANAGEMENT STRATEGY

Relating to the Company's sector of activity and nature of its transactions, it is of no doubt that it runs the risk of being exposed to a number of externalities which may have a negative influence on its governance and commercial strategy.

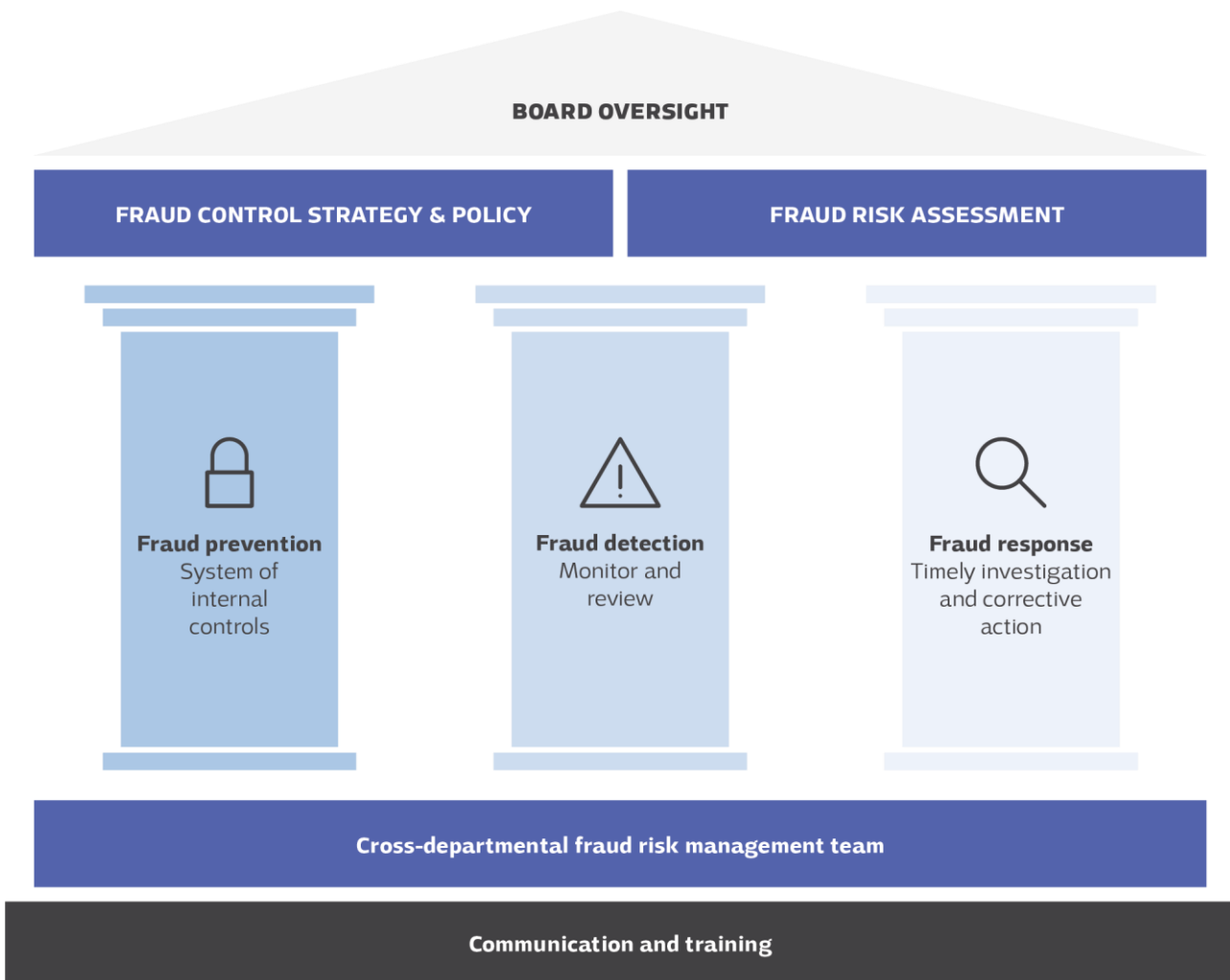
For this Policy, emphasis is on such threats causing the Company to be vulnerable to 'fraud risk'. An indicative list of some potential causing factors are provided below:

- Compromised values and ethical culture;
- Insufficient skepticism;
- Insufficient communication;
- Fear of retaliation.

Our fraud control strategy is hereby based on the following main pillars:

- **Fraud Risk Governance:** This includes setting the tone for fraud risk management from the top by those charged with governance and clearly delineating roles and responsibilities with regards to fraud risk management. Policies that encourage ethical behaviour should be established, communicated to the Employees and have their effectiveness assessed periodically by the Group Compliance, Regulatory, Business Control and Internal Audit team.
- **Fraud Risk Assessment:** This is a holistic and structured approach to fraud risk identification, assessment of impact and likelihood, ideally then highlighted on a on a risk heat map. It includes an appropriate risk response for the determination of risk mitigation plans. It uncovers which areas and what activities are more susceptible to fraud, the people in the organization who put us at risk, assesses internal controls, and helps organizations make informed decisions about where best to deploy scarce anti-fraud resources. Reaping the full benefits of fraud risk assessment, requires it to be executed independently and periodically through the right sponsor (e.g., board committee) with cross-departmental ownership of the assessment outcome.
- **Fraud Prevention and Deterrence:** Fraud deterrence involves eliminating factors that may cause fraud, whereas prevention refers to identifying and stopping existing fraud. Fraud prevention and deterrence is the first line of defence in reducing fraud risk and should be enforced by Employees at all level. Fraud prevention and deterrence are implemented through a sound system of preventive controls. Our fraud prevention techniques include a defined set of ethical standards, internal control procedures for an effective due diligence screening exercise (extended to employees and third parties), training program, Key Performance Indicators (KPIs), four eye principle and reporting to superiors/Board or its committees, and a continued transaction monitoring process.

- Fraud Detection:** While fraud prevention is not absolute and may not stop all potential fraudulent acts, fast detection of fraud comes into play to reduce the damage and acts as a deterrent to would-be fraudsters. Fraud detection involves the use of monitoring, data analytics and review tools to detect fraud when it occurs, e.g., process-level detection controls, substantive testing, and whistleblowing channels. This is followed with a reporting mechanism for getting the information to the right person. With the growing volume of data available today, investing in technologies and employing analytics to identify and mitigate fraud is increasingly viable and operations are requested to take this turn and make the most of existing tools. A Fraud Reporting Form (see annex 1) template has been defined to allow Employees to report fraud.
- Fraud Response:** Fraud response strategies are designed to provide guidance on dealing with detected or suspected cases of fraud in a measured and consistent manner. These are critical to restrict the damage and minimise the losses caused by fraud. Organisations benefit from incorporating thorough investigation protocols, remedial action protocols, and reporting and disclosure protocols into their fraud response plans. Modification to the fraud control strategy where weaknesses were identified may be warranted to prevent similar behaviour. All cases of insider fraud should be investigated in line with the Group Investigations Policy, in consultation with the Company's designated individual responsible for fraud investigations.
- The Fraud Risk Management Framework below is intended to help visualize how the key pillars listed above interact.



### 3.1 FRAUD MANAGEMENT PROGRAMME

For the purpose of properly assessing its exposure to fraud risk, the following set of procedures, which complements the Company's fraud risk assessment process, have been defined:

#### 3.1.1 ORGANISATION STRUCTURE

Board of Directors shall put much emphasis on the recruitment of competent and experienced personnel in the field of legal, ethics, corporate governance and compliance, who shall play a vital role in assisting the Company's Senior Management in cascading down the culture of ethical business conduct.

In order to ensure adherence to the defined Values and Professional Conduct among its Employees and related stakeholders, the Company has on a governance perspective made provisions for the following:

- Board charters including specific mandates to detect and manage risk factors;
- Setting up of dedicated ethics/compliance groups and board committees to look after the implementation and enforcement of the defined policies and procedures;
- The Company's Local Compliance Officer/Champion in consultation with the Group Legal and Compliance Team shall systematically review the Company's fraud risk assessment process relative to the changing circumstances, not limited to legal updates;
- Provide for a proper training programme for the Employees, including sensitization on their roles in combatting money laundering, fraud, among others.

#### 3.1.2 EMPOWERMENT OF EMPLOYEES

Empowerment of Employees in terms of specific tools to monitor ongoing transactions and instantly detect any 'Red Flags' or operational inconsistencies for further enquiry.

#### 3.1.3 EMPHASIS ON COMPLIANCE RELATED KEY PERFORMANCE INDICATORS

Extending the scope of service and relative Key Performance Indicators (KPI) of Employees for them to be accountable and transparent, by having timely reporting to the Line Manager and the Local Compliance Officer/Champion. Such evaluation exercise can take the form of onsite audits with the aim of testing actual adherence to the group's internal control framework.

#### 3.1.4 FRAUD RISK ASSESSMENT PROCESS

As part of the Company's fraud risk assessment process, it is to be highlighted that its Senior Management shall with the assistance from the Local Compliance officer/Champion:

- i. Arrange for brainstorming session among the Employees (inter-departmental) and its stakeholders to detect or identify the risk factors relating to its operations.
- ii. Independently rate the identified risk factors based on their individual 'Likelihood' to happen and potential 'Impact' if not given the due consideration. For a fair fraud risk assessment, such assessments shall not only be focused on the financial implications but must also consider potential risk factors around its reputation as an operator, its legal & regulatory requirements and overall compliance status.



- iii. Relative to the risk factors identified, to define such applicable internal control policies and procedures with the aim to mitigate its risk exposure or impact therefrom.

At this stage of the fraud risk assessment process, the Local Compliance Officer/Champion shall in consultation with the Group Legal and Compliance team define a set of control procedures and fraud management strategies, which shall be adopted by the Company's Senior Management, bearing in mind that no compromise shall be made on compliance related matters in order to benefit commercially.

- iv. Concluding step in the fraud risk assessment process shall be to critically review the whole evaluation process on at least an annual basis, with discussions around detecting new risk factors, review and updating of the company's fraud risk tolerance, examining the suitability of current control policies and procedures and accordingly taking relevant remedial actions.

Any update in this Policy or any other related policies, as adopted by the Company, must be duly communicated to the Employees and concerned stakeholders.

### 3.1.5 AWARENESS AND MONITORING - ANTI-FRAUD STRATEGY

For the whole fraud risk assessment process to be effective, it is required that the principles of this Policy be communicated to all Employees and relevant stakeholders, directly or indirectly linked to the Company's operations.

Transparency on the Company's strategy around fraud detection, evaluation, management and reporting is vital as it already sets the tone on its guiding principles for a fair business conduct, expected cooperation from the business counterparty and the underlying investigations and sanctions in case of any breach of the clauses governing the business relationship.

To that effect, the Local Compliance Officer/Champion shall with the support of the Group Legal and Compliance team, run timely training courses for Employees.

In order to ensure that this Policy is properly integrated in the ongoing operations, the Company's Local Compliance Officer shall ensure that:

- **Data Intelligence**

The Company's Local Compliance Officer/Champion shall on the basis of his ongoing compliance monitoring exercise compile a list of defaulters or blacklisted parties, to be updated from time to time, and share same with the Employees and the Group Legal and Compliance team, for onward transmission to other related entities.

The said list shall be used as a 'Red Flag' in the event of a prospective or proposal to renew a business engagement. Based on the identified control deficiencies, the data intelligence concept shall allow the decision makers to define adapted remedial action plan.

- **Review & Monitoring**

The Local Compliance Officer/Champion, supported by the Group Legal and Compliance Team shall review the occurrences, outcome and resolutions at least once a year with the aim to critically assess the Company's resilience to the underlying risk factors and to accordingly fine tune its risk mitigation strategy. With no compromise on the Company's compliance standards to be accepted, externalities shall be constantly monitored jointly by the reporting Line Manager and the Local Compliance Officer/Champion, and any influencing factor must be immediately reported to the Company's Senior Management for the matter to be dealt in consultation with the Group's Ethics Line, Internal Audit and Group Legal and Compliance team.

- **Awareness & Training**

While the concept of fraud management is highly volatile for its dependence on factors which may not be necessarily in control of the Company, the most that can be done is to prepare and equip the Employees with the right knowledge, technical know-how and competencies in view of at least preventing a fraudulent activity.

Such an initiative can take the form of timely workshops, in-house or external training courses with the aim to raise awareness and to share some key statistics on how the Company is managing 'fraud', detected cases and most importantly, what have been the outcome of the investigations, e.g., sanctions taken against the defaulter, remedial action plan with responsible person and timeline to implement.

## 4 ROLES AND RESPONSIBILITIES

### 4.1 EMPLOYEES

- Perform duties with honesty, integrity and in an ethical manner;
- Act with propriety in the use of the Company's resources, handling, and usage of funds whether they are involved with cash or payments systems, receipts or dealing with suppliers or customers;
- Be conscious to the possibility that unusual events or one-off transactions could be indicators of potential fraud;
- To immediately report details of suspected fraud (See Annex 1) or irregularity through the established information channel in accordance with this Policy and/or other related policies, including the Company's Whistleblowing Policy;
- Co-operate fully with dedicated Employees assigned to conduct internal checks, reviews, or investigations;
- Attend and participate in the training course to build and maintain their awareness and understanding of this Policy.

### 4.2 LINE MANAGERS

- Overall responsibility for preventing, detecting, and responding to the fraud risk on a day-to-day;
- Identify and assess risk prone operations and develop an effective system of internal control;
- Regularly review, test the internal controls in place by questioning the adequacy, relevance and robustness, and, where appropriate, amend or devise new controls to reduce the risk of similar fraud occurrence in the future;
- Inform Employees and relevant stakeholders about this Policy and ensure that regular caution, alert messages and enforceable clauses are included in business contracts and/or other relevant documents, duly highlighting the consequences of any breach or violation.

### 4.3 SENIOR MANAGEMENT

- Establish and maintain sound systems of risk management and internal control that support the achievement of company's strategy and business objectives;
- Ensure that appropriate training courses are available to the Employees;
- Ensure timely review and investigation on reported cases of noncompliance and allegations involving potential fraud;
- Define and enforce upon an appropriate sanctioning system, with defined risk mitigation strategy (e.g. disciplinary actions, report to the competent authorities, prosecution);
- Ensure that appropriate actions are taken to safeguard the recovery of assets and in order to prevent future recurrence of similar frauds, to provide for a proper tracking and case management system.

### 4.4 AUDIT AND RISK COMMITTEE

- Ensure that Senior Management implements appropriate fraud deterrence and prevention measures to encourage ethical behaviour and zero-tolerance attitude to fraud;
- Receive and review periodic reports from the Local Compliance Officer/Champion, describing the nature, status and disposition of any fraud or unethical conduct within the Company;
- Establish an open line of communication with Senior Management to assist in identifying fraud at highest levels of the Company and support investigation of any major fraudulent activity that might occur;
- Inform the Company's Board of Directors of any fraud or alleged fraud, and on the remedial actions taken;
- Monitor the effectiveness of the Company's procedures aimed at detecting, preventing, managing and reporting alleged fraud cases, and per se resolve to review and upgrade the internal control framework.

### 4.5 LOCAL COMPLIANCE OFFICER/CHAMPION

- The Local Compliance Officer/Champion shall with the support of the Group Legal and Compliance Team, investigate on potential fraud risks and/or reported cases;
- Relative to the nature and complexity of the reported case in a Company, the Group Legal and Compliance Team may for the sake of independence and to avoid any perceived conflict assign the investigation mandate to the Company's Local Compliance Officer/Champion (or to assist other Employees of the Group, having the relevant technical competencies and knowledge). See Article 6 below;
- Assist the Company's Senior Management in the design/review/updating of the internal control procedures to mitigate fraud risk;
- Conduct fraud awareness training, thus helping in educating employees and third parties about fraud prevention and detection;
- Ensure that the procedures for internal reporting from/to the various functions across the Company is laid down;
- Maintain a centralized fraud database where incidents of fraud are duly and timely recorded, capturing information such as fraud incident description, fraud perpetrator details, estimated fraud loss and recovery amounts (if any), control implications and resolution;
- Nurturing a culture of ethical behaviours and accountability that enable all employees to perform their duties to the highest standard of integrity;
- Co-ordinates with law enforcement agencies, for reporting frauds on timely and expeditious basis and follow-up processes thereon.

## 5 INTERNAL REPORTING PROCESS

With an increasing number of transactions, the Company is more exposed to 'fraud risk'. As per the Company's Values, whereby much emphasis is put on being bold and committed while preaching a high level of ethical standards, there is much reliance on the high level of professionalism among its Employees for an effective fraud prevention and management process.

Besides their legal obligations to report any case of wrongdoing or case of fraud while completing their daily operations/tasks, Employees are sensitised on their morale obligation to contribute in the Company's strategy to counter such occurrences.

Compliance with this Policy is critical to sustaining the Company's integrity in managing frauds. The Company is committed to a culture that encourages its Employees and Business Partners to speak up when they see something that violates or could possibly violate the law or company policies and seek help when they are unsure about the proper course of action. If they suspect a violation, or possible violation of this Policy, they have an obligation to report their concerns to the Local Compliance Officer/Champion, with such details required under the Fraud Reporting Form (see Annex 1).

In case of any clarification or assistance required to ensure adherence to the procedures defined herein or to report an improper conduct or a violation of the laws, regulations, the Code of Ethics & Professional Conduct or this Policy, the Employee shall contact the Local Compliance Officer/Champion, who in turn shall initiate the necessary procedures. In the event where Employee is not satisfied with the internal assistance, he may, except otherwise provided under the local laws (for instance to report the matter to the local competent authority), follow up with the Local Compliance Officer.

## 6 INVESTIGATION PROCESS

While the Company's Local Compliance Officer/Champion, with support from the Group Legal and Compliance team, shall ensure that ongoing training and awareness programs are ran to sensitize the Employees on their obligation to report any suspected case, the Company has provided for the below procedures:

- i. All transactions shall be undertaken in accordance with the defined internal control procedures, including the identification of business counterparties and scrutinising the ongoing transaction, with the relative qualifying documents on records;
- ii. Any doubtful occurrence, requiring further clarity prior to execution must be escalated to the Line Manager and discussed with the Local Compliance Officer/Champion for a consensus to be reached as regard to the way forward;
- iii. During the preliminary enquiry phase, the Line Manager and Local Compliance Officer of the Company shall apply their own value judgement and have a questioning mind with focus on additional intelligence to be gathered from other reliable sources;
- iv. In cases where the suspicion tends to be confirmed by the Line Manager and Local Compliance Officer/Champion of the Company, the Local Compliance Officer of the Company shall ensure that the Fraud Reporting Form (See Annex 1) is duly completed, with the relevant supporting documents compiled for same to be escalated to the Company's Senior Management, who shall in turn seek assistance from the Group Legal and Compliance team;
- v. Relative to the nature and complexity of the reported case within a Company, the Group Legal and Compliance Team may for the sake of independence and avoidance of any perceived conflict during the investigation, assign an internal investigation mandate to other Employees of the Group, not limited to a Local Compliance Officer/Champion or HR Manager or Line Manager, provided that the latter hold the relevant technical competencies, experience and knowledge to deal with such cases;

- vi. Depending on the severity of the findings and harm caused to the Company, as reported by the designated inspection team in the form of an internal investigation report, the Company's Senior Management shall on the advice of the Group Legal and Compliance team and Ethics Line resolve to appoint an independent auditor with a specific scope of work (e.g. forensic audit);

The investigation shall be conducted fairly, as a neutral fact-finding process and without presumption of guilt, as provided in the Company's in the 'Investigation Policy'. The severity of the case would be based on identifying if the allegation is a potential violation of law, regulation, or Company policies;

- vii. As a matter of transparency in view of avoiding potential confusion among the Employees, the Company's Senior Management shall at its own discretion, without causing any prejudice to the ongoing investigation and parties involved, arrange to communicate on the Company's stand and way forward. Results of the investigation shall not be disclosed or discussed with anyone other than that who have a legitimate need to know;
- viii. Upon completion of the investigation, the Company's Senior Management shall determine the course of actions to be taken, as it shall deemed to be appropriate. As the end-outcome, the Company may consider to:
  - a. Immediately terminate the business relationship shared with the defaulting party;
  - b. Seek legal recourse for compensation relative to the loss incurred; and
  - c. File a formal case before the competent authorities and court.
- ix. Should the investigating team determine that the reported case is not credible or is not fraudulent in nature, the investigator shall document this determination along with facts based on which determination has been made. The Company may, for example, incorporate changes to the existing internal control framework to prevent occurrence of similar cases in the future.

## 7 RECORD KEEPING

The Company's Local Compliance Officer/Champion must keep record of all the documents related to the reporting (See Annex 1) and findings from the investigation conducted.

For ease of reference, a detailed 'Fraud Register' bearing relevant information, such as the date reported, concerned business unit, reported red flag, brief on the case and remedial actions taken, among others shall be maintained by the Company's Local Compliance Officer/Champion. The Fraud Register shall be made available for audit purposes and internal reporting only.

## 8 CONFIDENTIALITY

To prevent undue prejudice to those implicated in fraud, all received and investigated information relating to fraud will be treated as highly confidentially. Therefore, fraud related information will not be disclosed or discussed with any person(s) other than those who have a legitimate right to such information.

Any public communications and comments by the company to the press, law enforcement or other external parties in relation to incidents of fraud shall only be made by authorized spokespersons of the Company and coordinated through the Group Legal and Compliance team.

## 9 VIOLATIONS

Any violation of this Policy by an Employee shall be deemed serious and will be considered as such in any disciplinary proceedings including termination of employment for misconduct. It will be dealt with under the terms of the applicable disciplinary procedures as well as appropriate legal action and the immediate termination of any working or business arrangements.

## 10 REVIEWS AND AMENDMENTS

The Group Legal & Compliance Department will monitor the effectiveness of existing procedures for the implementation of this Policy. Changes may be made to this Policy to reflect evolving norms and practices in the industry in which the Company operates.

Reviews are carried out when any of the following circumstances occurs:

- Every three years from the last approval date;
- Material audit findings/ gaps in this Policy;
- Major cases of violations of this Policy, measures taken and need for additional measures to be implemented;
- Recommendations of auditors;
- Changes in the economic, legal, regulatory and social environment;
- The addition of new business activities or the Company's presence in new, more sensitive markets.

## 11 RELATED DOCUMENTS

- Code of Ethics & Professional Conduct
- Supplier Code of Conduct
- Anti-Bribery & Corruption Policy
- Gifts & Hospitality Policy
- AML CFT Policy
- Conflict of Interest Policy
- Whistleblowing Policy
- Sponsorships & Donations Policy
- Third Party Management Policy

# ANNEX 1 – FRAUD REPORTING FORM

## Fraud Reporting Form

Type of Red Flag/Fraud identified \_\_\_\_\_

(to provide a brief on the occurrence)

### IDENTIFYING THE CONCERNED PARTIES

AXIAN entity/ies \_\_\_\_\_

AXIAN officer(s) involved \_\_\_\_\_

### BUSINESS PARTY 1

Full Name \_\_\_\_\_

Country \_\_\_\_\_

Description on business relationship \_\_\_\_\_

### BUSINESS PARTY 2

Full Name \_\_\_\_\_

Country \_\_\_\_\_

Description on business relationship \_\_\_\_\_

### TRANSACTION DETAILS

Date of transaction \_\_\_\_\_

Amount paid/to be paid \_\_\_\_\_

Currency \_\_\_\_\_

Mode of Payment \_\_\_\_\_

Name and Address of ultimate beneficiary/ies \_\_\_\_\_

Brief on observations and outcome from preliminary enquiry \_\_\_\_\_

(with supporting documents)

### PARTICULARS OF REPORTING PERSON

Full name of Employee \_\_\_\_\_

Position held \_\_\_\_\_

Business Unit \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

### INTERNAL USE

Dated received \_\_\_\_\_

Supporting documents enclosed

Y

N