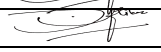
ANTI-FRAUD POLICY

DISTRIBUTION

This Anti Fruad Policy are communicated to all employees. A copy is available at the Head Office, held in the sites folder, and published on the internal company shared drive. All employees are encouraged to read it and communicate any queries to a Director.

REVISION HISTORY

Issue Number	Review Date	Changes	Signed
01	22/09/2023	Original version (draft)	
01	22/09/2023	Signed off	
01	20/09/2024	Review	
01	19/09/2025	Review	
02	20/05/2026	Address Updated	
02	18/09/2026	Review	

Our goal is to establish and maintain a business environment of fairness, ethics and honesty for our employees, our customers, our suppliers and anyone else with whom we have a relationship. To maintain such an environment requires the active assistance of every employee and manager every day.

Our organisation is committed to the deterrence, detection and correction of misconduct and dishonesty. The discovery, reporting and documentation of such acts provides a sound foundation for the protection of innocent parties, the taking of disciplinary action against offenders up to and including dismissal where appropriate, the referral to law enforcement agencies when warranted by the facts, and the recovery of assets.

Purpose

The purpose of this document is to communicate company policy regarding the deterrence and investigation of suspected misconduct and dishonesty by employees and others, and to provide specific instructions regarding appropriate action in case of suspected violations.

Definition of Misconduct and Dishonesty

For purposes of this policy, misconduct and dishonesty include but are not limited to:

- Acts which violate the organization's Code of Conduct
- Theft or other misappropriation of assets, including assets of the company, our customers, suppliers or others with whom we have a business relationship.
- Misstatements and other irregularities in company records, including the intentional misstatement of the results of operations
- Profiteering as a result of insider knowledge of company activities
- Disclosing confidential and proprietary information to outside parties
- Forgery or other alteration of documents
- Accepting or seeking anything of value (limits defined in [Code of Conduct, gift and entertainment policy, anti-bribery)) from contractors, vendors, or other persons providing services/materials to the company.
- Fraud and other unlawful acts
- Any similar acts.

The company specifically prohibits these and any other illegal activities in the actions of its employees, managers, executives and others responsible for carrying out the organisations activities.

Policy and Responsibilities

Reporting

It is the responsibility of every employee, supervisor, and manager to immediately report **suspected** misconduct or dishonesty to their supervisor or manager.
Supervisors, when made aware of such potential acts by subordinates, must immediately report such acts to their manager. Any reprisal against any employee or other reporting individual because that individual, in good faith, reported a violation is strictly forbidden.

Due to the important yet sensitive nature of the suspected violations, effective professional follow up is critical. Managers, while appropriately concerned about "getting to the bottom" of such issues, should not in any circumstances perform any investigative or other follow up steps on their own. **Concerned but uninformed managers represent one of the greatest threats to proper incident handling.** All relevant matters, including suspected but unproved matters, should be referred immediately to those with follow up responsibility.

Additional Responsibilities of Supervisors

All employees have a responsibility to report suspected violations.

However, employees with supervisory and review responsibilities at any level have additional deterrence and detection duties. Specifically, personnel with supervisory or review authority have three additional responsibilities.

First, you must become aware of what can go wrong in your area of authority.

Second, you must put into place and maintain effective monitoring, review and control procedures that will prevent acts of wrongdoing.

Third, you must put into place and maintain effective monitoring, review and control procedures that will detect acts of wrongdoing promptly should prevention efforts fail.

Authority to carry out these three additional responsibilities is often delegated to subordinates. However, accountability for their effectiveness cannot be delegated and will remain with supervisors and managers.

Managing Director

Name: Danish Iftikhar

Sign: 

Dated: 22/09/2023