



## ANTI FRAUD POLICY

Doc: S&P-IMS-POL-09

Rev: 00

Level: 01

Date: 15.02.2021

**Shanfari & Partners Co. LLC** is committed to maintain high legal, ethical and moral standards, to adhere to the principles of integrity, objectivity and honesty and wishes to be seen as opposed to fraud and corruption in the way that it conducts its business.

All members of staff are expected to demonstrate this commitment. The objective of this policy is to promote a culture which deters fraudulent activity and to facilitate the prevention and detection of fraud and the development of procedures which will aid in the investigation of fraud and related offences and which will ensure that such cases are dealt with timely and appropriately.

The term fraud is commonly used to describe a wide range of misconducts including theft, corruption, embezzlement, bribery, forgery, misrepresentation, collusion, money laundering and concealment of material facts. It often involves the use of deception to make a personal gain for oneself, a connected person or a third party, or a loss for another – intention is the key element that distinguishes fraud from irregularity. Fraud does not just have a potential financial impact, but it can cause damage to the reputation of the company.

Process owners/managers of the S&P are responsible for the day-to-day management of fraud risks and action plans, as set out in the fraud risk assessment and particularly for,

- Ensuring that an adequate system of internal control exists within their area of responsibility.
- Preventing and detecting fraud.
- Ensuring due diligence and implementing precautionary actions in case of suspicion of fraud.
- Taking corrective measures, including any administrative penalties, as relevant.

This policy applies to any irregularity, or suspected irregularity, involving employees as well as shareholders, consultants, vendors, contractors, outside agencies doing business with employees of such agencies, and/or any other parties with a business relationship with Shanfari & Partners Co. LLC.

The CEO is responsible for the administration, revision, interpretation, and application of this policy. This policy will be made available for any interested parties and communicated to all the employees. The policy will be reviewed annually and revised as needed.

**CONTROLLED COPY**

Salalah  
15.02.2021

  
Chief Executive Officer