



GOLDEN BROKERS

ANTI-FRAUD POLICY



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1. GENERAL

- 1.1. Golden Brokers Ltd. (the “Company”), is committed to the highest possible standards of openness, transparency and accountability in all its affairs. We wish to promote a culture of honesty and opposition to fraud in all its forms.
- 1.2. The purpose of this policy is to provide:
 - A clear definition of what we mean by ‘Fraud’;
 - A definitive statement to employees forbidding fraudulent activity in all its forms;
 - A summary to staff of their responsibilities for identifying exposure to fraudulent activity and/or detecting such fraudulent activity when it occurs;
 - Guidance to employees as to action which should be taken where they suspect any fraudulent activity;
 - Clear guidance as to responsibilities for conducting investigations into fraud related activities;
 - Protection to employees in circumstances where they may be victimised as a consequence of reporting, or being a witness to, fraudulent activities.

2. WHAT IS FRAUD

- 2.1. Fraud involves an act of intentional deceit to secure (by the act or omission of another person) an unfair or unlawful gain for oneself or another or a loss to another. Acts such as deception, bribery, forgery, extortion, corruption, conspiracy, embezzlement, misappropriation, and collusion may or may not constitute fraud, but are also included within the scope of this policy.
- 2.2. The main types of fraud are:
 - Theft- This may include the removal or misuse of funds, assets or cash;
 - False accounting- dishonest destroying, defacing, concealing, or falsifying any account, record or document required for any accounting purpose, with a view to personal gain or gain of another, or with the intent to cause loss to GBL or furnishing information which is or may be misleading, false or deceptive.
- 2.3. Examples of fraud:
 - False accounting, including deliberate misstatement of financial information for personal and/or financial gain;
 - Theft including trade secrets, intellectual property, equipment, etc;
 - Using false payment instructions, invoices or cheques in order to receive a payment to one’s own account, or to a third-party account in exchange for a benefit;
 - Falsification of payroll records, unsubstantiated expenses claims, accepting or providing bribes or kickbacks in exchange for business whether or not for GBL’s benefit;
 - Acts by intermediaries, including any act or omission knowingly committed with the intent to obtain a benefit through deceit. This would include, but not limited to: forgery or intentionally





presenting false information on an application or in connection with the renewal or reinstatement or in support of a claim or refund; the manipulation of customer information in order to unlawfully obtain customer funds: fraudulent representations in sales and marketing activities: and embezzlement or theft of company or client assets.

3. RESPONSIBILITIES OF THE EMPLOYEES

- 3.1. It is the responsibility of all employees to carry their work in such a way as to prevent fraud occurring in the workplace. Employees must also be alert for occurrences of fraud, be aware that unusual transactions or behaviours could be indications of fraud and report potential cases of fraud.
- 3.2 Employees must stay alert to the signs of fraud and report suspicion of fraud immediately, regardless of value, to the manager, or Compliance Officer or anonymously via the company's website. The Board of Directors must immediately be notified if the alleged fraud involves manipulation, omissions or misrepresentation of financial reports/ results.
- If your subordinate reports any suspected fraud then you should, in turn, report the matter to Board of Directors and/or Compliance Officer;
 - Do not alert the suspected individual or other unauthorised persons in an effort to determine facts or suspicion. All cases of suspected fraud will be handled with utmost care / confidentiality;
 - Attend any relevant training programs provided by the company to understand your obligations. Work in accordance with the Operating Principles;
 - Line Functions are required to establish and maintain sufficient controls to ensure that fraud risk is properly monitored and mitigated. All employees should company with controls and procedures in their areas of responsibility;
 - Cooperate in investigations and do not wilfully or knowingly state anything which you believe is false or you do not believe to be true.

4. DEALING WITH REPORTS OF SUSPECTED FRAUD

- 4.1. The Company is committed to fraud control with an emphasis on proactive prevention, putting in place detection measured in its effort to reduce possibilities which could lead to fraud. We believe in zero tolerance to fraud. Thus, when a Fraud is detected, suspected or alleged, we are committed to fully investigate the matter. We will work closely with the relevant authorities to ensure that justice is served and implement measures to recover as well as to minimize losses.

5. CONFIDENTIALITY

- 5.1. The Company treats all information received confidentially. Any employee who suspects a dishonest or fraudulent activity will notify the Board of Directors and should not attempt to personally conduct investigations or interview/ Interrogations related to any suspected fraudulent act.

6. ACTIONS ARISING FROM FRAUD INVESTIGATIONS

- 6.1. Persons who are found to be guilty of fraud have committed gross misconduct and will be dealt with in accordance with our fraud policy. Proven allegation of fraud may result in dismissal.

