



## **ANTI-FRAUD POLICY**

### **1. What is Fraud?**

The definition of fraud, refers to the intentional perversion of truth, in order to induce another to part with something of value or to surrender a legal right. As such, fraudulent activity is in essence unethical and can be considered illegal. Lacking risk assessment in the case of fraud may lead to legal investigation, resulting in fines, and other penalties at company scale and/or at an individual scale. FAR EAST COMMODITIES SA ("FEC") seriously emphasize on its assessment of any kind fraudulent doing as it can seriously compromise its reputation.

*This following Fraud Policy settle FEC' approach on ruling-out and preventing fraud in its workplace and activities.*

### **2. Who is concerned by this policy?**

This policy takes effect on all employees, directors, officer as well as contractors under FEC' direct supervision, working for a FEC office or industrial asset directly or indirectly controlled or operated by FEC.

### **3. What is our dedication to address and prohibit fraud?**

We do not engage in any kind of fraudulent behaviour, nor do we knowingly assist or facilitate any third party to commit fraud.

We define the following activities, amongst others, may constitute fraud:

- destroying, manipulating, altering, or forging company records
- manipulating financial or accounting records
- knowingly creating 'fake' contracts which do not reflect the true nature of the contractual relationship, such as contracts that we have no intention of performing, or contracts that do not accurately describe the intended transaction
- backdating contracts to misrepresent the signature date
- knowingly creating or paying false claims or invoices
- falsifying or duplicating expense claims, and
- deliberately misrepresenting, concealing or not disclosing material facts relevant to a decision or transaction.



**We require employees to be alert to any unusual or suspicious arrangements which could expose us to the risk of fraud and to report any such arrangements to senior management of executives in compliance with our Values and Code of Conduct.**

#### **4. What is FEC expecting from its employees?**

At FEC, we are each hold accountable for ensuring that we meet our goal. We expect our employees and contractors to express openly and raise concerns about possible infringement of the Values and Code of Conduct and this policy with their supervisor or via available reporting means.

FEC takes those distresses seriously and is capable of handling them promptly. As such, FEC has zero tolerance for retaliation of any kind against anyone speaking openly about behaviour or activity they believe is unethical, illegal or not in line with our Values and Code of Conduct and aforementioned policies, even if such concern isn't substantiated, as long as they have not knowingly made a false report.

#### **5. What are the consequences?**

Our policies are in line with our Values and Code of Conduct and reflect what is important to us and our activities.

FEC takes violation of our policies seriously. Depending on the severity of the violation, consequences may range from a warning to a plain termination of employment.

**Far East Commodities SA**