

Fraud and Corruption Management Policy &

Procedure for Reporting and Investigating Fraud

Introduction:

Fraud and corruption can have serious consequences for an organization, including financial losses, damage to reputation, and legal penalties. Therefore, it is essential for our organization to have a Fraud and Corruption Management Policy and Procedure in place to prevent, detect, and investigate such incidents.

Policy Statement:

Our organization has a zero-tolerance approach to fraud and corruption. We are committed to ensuring that our business is conducted with the highest level of integrity, honesty, and transparency. This policy is designed to promote and encourage ethical behavior and to provide a mechanism for reporting and investigating suspected incidents of fraud and corruption.

Scope:

This policy applies to all employees, contractors, and agents of JB Dondolo, including third-party vendors and suppliers.

Definitions:

<u>Fraud</u>: any intentional act or omission designed to deceive others, resulting in a loss to JB Dondolo or personal gain to the individual committing the fraud.

Corruption: the abuse of entrusted power for private gain.

Policy:

Reporting Suspected Incidents of Fraud and Corruption

- a. Any employee who suspects that an incident of fraud or corruption has occurred must report it immediately to their supervisor or the designated fraud and corruption reporting line.
- b. Reports can be made anonymously and will be treated confidentially.
- c. JB Dondolo will not tolerate retaliation against individuals who report suspected incidents of fraud and corruption in good faith.
- d. Failure to report suspected incidents of fraud and corruption may result in disciplinary action.

Investigating Suspected Incidents of Fraud and Corruption

- a. JB Dondolo will investigate all reported incidents of fraud and corruption promptly and thoroughly.
- b. An investigation team will be appointed, consisting of individuals with the necessary skills and

expertise to conduct a thorough investigation.

- c. The investigation team will have the authority to access all relevant information and interview employees and other individuals involved in the incident.
- d. JB Dondolo will cooperate with any law enforcement agencies or regulatory bodies investigating the incident.

Disciplinary Action

- a. If an investigation confirms that an incident of fraud or corruption has occurred, JB Dondolo will take appropriate disciplinary action, which may include termination of employment, civil action, and criminal prosecution.
- b. JB Dondolo will take steps to recover any losses resulting from the incident.
- c. Individuals found to have participated in or facilitated the incident may be subject to disciplinary action, up to and including termination of employment.

Prevention of Fraud and Corruption

- a. JB Dondolo will implement measures to prevent fraud and corruption, including internal controls, training, and communication programs.
- b. JB Dondolo will conduct periodic risk assessments to identify areas of vulnerability to fraud and corruption.
- c. JB Dondolo will take appropriate measures to mitigate identified risks.
- d. JB Dondolo will periodically review and update this policy and its associated procedures.

Conclusion:

This policy and procedure provide a framework for preventing, detecting, and investigating incidents of fraud and corruption. JB Dondolo is committed to maintaining the highest standards of integrity and ethical conduct and to taking swift and appropriate action to address any incidents of fraud and corruption that may occur.