

FRAUD RISK MANAGEMENT

POLICY

OF

KNAB FINANCE ADVISORS

PRIVATE LIMITED

(KNAB)

1. Purpose

The purpose of this Fraud Risk Management Policy is to establish a comprehensive framework for identifying, assessing, mitigating, and managing the risk of fraud within the Company. This policy aims to ensure the integrity of our operations, protect our assets, and maintain the trust of our stakeholders.

2. Scope

This policy applies to all employees, contractors, third-party vendors, and any other individuals associated with the Company.

3. Definitions

Fraud: Any intentional act or omission designed to deceive others, resulting in a financial or reputational loss to Company.

Fraud Risk: The potential for fraud to occur and adversely impact the organization.

4. Fraud Risk Identification

4.1. **Risk Assessment:** Regularly assess and identify areas susceptible to fraud through a comprehensive risk assessment process.

4.2. **Whistleblower Mechanism:** Establish and promote a confidential whistleblower reporting mechanism for employees and stakeholders to report suspected fraudulent activities.

5. Prevention and Detection

5.1. **Code of Conduct:** Develop and communicate a clear Code of Conduct outlining ethical standards and expectations for all individuals associated with the organization.

5.2. **Segregation of Duties:** Implement and maintain a system of segregation of duties to prevent any single individual from having control over multiple aspects of a process.

5.3. **Employee Training:** Conduct regular training sessions to educate employees about fraud risks, prevention techniques, and the importance of reporting suspicions promptly.

6. Fraud Response and Investigation

6.1. Incident Reporting: Establish a clear process for reporting suspected incidents of fraud promptly.

6.2. Investigation Team: Form an investigation team with the necessary expertise to conduct a thorough and unbiased investigation into reported incidents.

6.3. Legal Action: Cooperate with law enforcement agencies, if necessary, and take legal action against individuals found guilty of fraudulent activities.

7. Monitoring and Review

7.1. Continuous Monitoring: Implement ongoing monitoring processes to detect and address emerging fraud risks.

7.2. Policy Review: Periodically review and update this Fraud Risk Management Policy to ensure its effectiveness and relevance.

8. Communication and Training

8.1. Communication Plan: Develop a communication plan to ensure that all stakeholders are aware of the organization's commitment to preventing and addressing fraud.

8.2. Training Programs: Regularly conduct training programs for employees, emphasizing their role in fraud prevention and detection.

9. Compliance and Enforcement

9.1. Policy Compliance: All individuals associated with the organization are required to comply with this policy. Non-compliance may result in disciplinary action, including termination of employment or legal action.

10. Review Frequency

This policy will be reviewed annually or as needed to ensure its effectiveness.

11. Conclusion

Company is committed to maintaining the highest standards of integrity and ethical conduct. This Fraud Risk Management Policy is a crucial element in safeguarding our organization against fraud and ensuring the trust of our stakeholders.