

Fraud, Corruption, Anti-Money Laundering, and Counter-Terrorist Financing Policy

1.1 Introduction

This policy is part of SysReforms International's Code of Conduct, detailing principles and instructions to combat fraud, corruption, anti-money laundering (AML), and counter-terrorist financing (CTF). The company is committed to maintaining the highest ethical standards in all business activities, acting with fairness and integrity, and complying with applicable laws.

1.2 Purpose & Scope

This policy aims to:

- Define our position on fraud, corruption, AML, and CTF.
- Establish procedures for identifying and mitigating related risks.
- Ensure compliance with relevant laws and regulations.
- Promote a culture of honesty, integrity, and transparency within the Company.

This policy applies to all employees, directors, contractors, consultants, partners, and any associated persons working with or on behalf of SysReforms International.

1.3 Definitions

- **Fraud:** The intentional act of deceiving another party to gain an unfair or unlawful advantage.
- **Corruption:** The abuse of entrusted power for private gain.
- **Money Laundering:** The process of concealing the origins of money obtained from illegal activities.
- **Terrorist Financing:** Providing financial support to terrorist activities or organizations.

1.4 Policy Statements

SysReforms International adheres to the following principles:

1.4.1 Fraud Prevention and Detection

SysReforms International adopts a zero-tolerance approach to fraud. All employees and associated persons must:

- Act with honesty and integrity
- Report any suspected fraudulent activities immediately
- Cooperate with investigations into suspected fraud

1.4.2 Anti-Corruption Measures

We prohibit all forms of corruption, including bribery and facilitation payments. Employees and associated persons must not:

- Offer, give, solicit, or accept any form of bribe.
- Engage in any activity that could be perceived as corrupt.

1.4.3 Anti-Money Laundering (AML)

To combat money laundering, we will:

- Conduct due diligence on all clients and partners
- Monitor and report suspicious activities to the relevant authorities
- Maintain accurate records of transactions
- Business transactions must be transparent and accurately recorded

1.4.4 Counter-Terrorist Financing (CTF)

We are committed to preventing terrorist financing by:

- Implementing robust screening procedures
- Reporting any suspicious activities related to terrorism
- Cooperating with law enforcement agencies

1.5 Preventive Measures

To prevent fraud, corruption, money laundering, and terrorist financing, the Company will:

- Implement robust internal controls and audit mechanisms
- Conduct due diligence on all employees, contractors, and business partners
- Provide regular training and awareness programs for employees
- Ensure proper documentation and authorization procedures for all transactions.

1.6 Responsibilities

- **Employees:** Must avoid any activity that might lead to or suggest a breach of this policy. They must report any suspicious activity to their manager or through the company's reporting mechanisms. Reports can be made confidentially to the designated compliance officer.
- **Management:** Responsible for enforcing the policy and overseeing its implementation.
- **Compliance Officer:** Ensures compliance with AML and CTF regulations, conducts training, and manages reporting procedures.

1.7 Training and Communication

- **Training:** Regular training will be provided to employees to ensure they understand the risks and their responsibilities.
- **Communication:** This policy will be communicated to all employees, contractors, and business partners.

1.8 Sanctions and Disciplinary Measures

Violations of this policy will result in disciplinary action, which may include termination of employment or contracts, and legal proceedings.

1.9 Monitoring and Review

The Company will regularly review and update this policy to ensure its effectiveness and compliance with legal requirements.

Conclusion

SysReforms International is committed to maintaining a culture of integrity and ethical conduct. By adhering to this policy, we aim to prevent fraud, corruption, and money laundering, ensuring a fair and transparent business environment. All employees and associated persons are expected to uphold these values and comply with this policy.