



## Anti-Fraud Policy

Developed by HumanImpact5 – HI5 LLC, 30 August 2022  
Updated and approved by the HI5 Governance Administrator

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## ANTI-FRAUD POLICY

### Background

The anti-fraud policy is established to facilitate the development of controls that will aid in the detection and prevention of fraud against HI5 Governance (HI5G) LLC. It is the intent of HI5G to promote consistent organizational behaviour by providing guidelines and assigning responsibility for the development of controls and conduct of investigations.

### Scope

This policy applies to any irregularity, or suspected irregularity, involving employees, associates, consultants, interns, or any other person affiliated to HI5G within their working relationship with HI5G.

Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship to HI5G.

### Policy

The Director of HI5G is responsible for the detection and prevention of fraud, misappropriations, and other irregularities. Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury. The Director will be familiar with the types of improprieties that might occur within his or her area of responsibility and be alert for any indication of irregularity.

Any irregularity that is detected or suspected must be reported immediately to **ethics(at)hi5governance.ch** which is received by the Administrator of HI5G who coordinates all investigations, both internal and external.

### Actions Constituting Fraud

The terms defalcation, misappropriation, and other fiscal irregularities refer to, but are not limited to:

- Any dishonest or fraudulent act
- Misappropriation of funds, securities, supplies, or other assets
- Impropriety in the handling or reporting of money or financial transactions
- Profiteering as a result of insider knowledge of company activities
- Disclosing confidential and proprietary information to outside parties
- Disclosing to other persons securities activities engaged in or contemplated by HI5G
- Accepting or seeking anything of material value from clients, partners, or persons providing services/materials to HI5G. Exception: Gifts less than \$50 in value.
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; and/or
- Any similar or related irregularity

### Other Irregularities

Irregularities concerning the moral, ethical, or behavioural conduct of an employee, associate, consultant, intern, or any other person affiliated to HI5G within their working relation with HI5G, should be resolved by within HI5G's own mechanisms rather than through external parties.

If there is any question as to whether an action constitutes fraud, send an email to **ethics(at)hi5governance.ch** which is received by the Administrator of HI5G and who may designate another contact person for guidance.

### Investigation Responsibilities

The Administrator or the otherwise designated person has the primary responsibility for the investigation of all suspected fraudulent acts as defined in the policy. If the investigation substantiates that fraudulent activities have occurred, the Administrator or the otherwise designated person will issue reports to appropriate designated persons.

Decisions to prosecute or refer the examination results to an external party for independent investigation will be made in conjunction with the Administrator or the designated person, as will final decisions on disposition of the case.

### Confidentiality

The Administrator, the designated person, or any external investigator treats all information received confidentially. Any employee, associate, consultant, intern, or any other person affiliated to HI5G, who suspects dishonest or fraudulent activity within their working relations to HI5G will send an email to **ethics(at)hi5governance.ch** immediately and should not attempt to personally conduct investigations or interviews/interrogations related to any suspected fraudulent act (see Reporting Procedure section below).

Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect HI5G from potential civil liability.

### Authorization for Investigating Suspected Fraud

The Administrator, the designated person, or the external investigator will have:

- Free and unrestricted access to all HI5G records and premises, whether owned or rented; and
- The authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who might use or have custody of any such items or facilities when it is within the scope of their investigation.

### Reporting Procedures

Great care must be taken in the investigation of suspected improprieties or irregularities so as to avoid mistaken accusations or alerting suspected individuals that an investigation is under way.

An employee, associate, consultant, intern, or any other person affiliated to HI5G who discovers or suspects fraudulent activity within their working relations with HI5G will send an email to **ethics(at)hi5governance.ch**. The employee or other complainant may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual, their attorney or representative, or any other inquirer should be directed to the Administrator or the otherwise designated person. No information concerning the status of an investigation will be given out. The proper response to any inquiries is: "I am not at liberty to discuss this matter." Under no circumstances should any reference be made to "the allegation," "the crime," "the fraud," "the forgery," "the misappropriation," or any other specific reference.

The reporting individual should be informed of the following:

- Do not contact the suspected individual in an effort to determine facts or demand restitution.
- Do not discuss the case, facts, suspicions, or allegations with any one unless specifically asked to do so by the Administrator or the designated person.

### Termination

If an investigation results in a recommendation to terminate an individual, the recommendation will be reviewed for approval by the designated representatives from HI5G and, if necessary, by outside counsel, before any such action is taken. The Administrator or the otherwise designated person does not have the authority to terminate an employee, or the working relations of an associate, consultant, intern, or any other person affiliated to HI5G in her capacity as investigator of the fraud case. The decision to terminate the working relations of an employee, associate, consultant, intern, or any other person affiliated to HI5G is made by the employee's or concerned person's management within HI5G. Should the Administrator or the otherwise designated person believe the management decision inappropriate for the facts presented, the facts will be presented to the executive level management for a decision.

### Administration

The Administrator of HI5G or the otherwise designated person is responsible for the administration, revision, interpretation, and application of this policy. The policy will be reviewed and revised as needed.