

ANTI FRAUD (AND FINANCIAL CRIME) POLICY

POLICY OBJECTIVE

GLOBAL CAPITAL MARKET LIMITED (“the Company”) is committed to the highest possible standards for openness, transparency and accountability in all of its affairs. We wish to promote a culture of honesty and opposition to fraud (and financial crime) in any form.

The purpose of this policy is to provide:

- i. A clear definition of what we mean by ‘Fraud’;
- ii. A definitive statement to employees forbidding fraudulent activity in all its forms;
- iii. A summary to staffs regarding their responsibilities for identifying exposure to fraudulent activity and/or detecting such fraudulent activity when it occurs;
- iv. Guidance to employees as to action which should be taken where they suspect any fraudulent activity;
- v. Clear guidance as to responsibilities for conducting investigations into fraud related activities;
- vi. Protection to employees in circumstances where they may be victimized as a consequence of reporting, or being a witness to fraudulent activities.

WHAT IS FRAUD

Fraud involves an act of intentional deceit to secure (by the act or omission of another person) an unfair or unlawful gain for oneself or another or a loss to another. Acts such as deception, bribery, forgery, extortion, corruption, conspiracy, embezzlement, misappropriation, and collusion may or may not constitute fraud, but are also included within the scope of this policy.

The main types of frauds are:

- i. Theft - This may include the removal or misuse of funds, assets or cash;
- ii. False accounting - Dishonest destroying, defacing, concealing, or falsifying any account, record or document required for any accounting purpose for personal gain or gain of another, or with the intent to cause loss to the Company or furnishing information which is or may be misleading, false or deceptive.

Examples of fraud:

- i. False accounting, including deliberate misstatement of financial information for personal and/or financial gain;
- ii. Theft including trade secrets, intellectual property, equipment etc.;
- iii. Using false payment instructions, invoices or cheques in order to receive a payment to one’s own account, or to a third-party account in exchange for a benefit;
- iv. Falsification of payroll records, unsubstantiated expenses claims, accepting or providing bribes or kickbacks in exchange for business whether or not for the Company’s benefit;
- v. Acts by intermediaries, including any act or omission knowingly committed with the intent to obtain a benefit through deceit. This would include, but not limited to: forgery or intentionally presenting false information on an application or in connection with the renewal or reinstatement or in support of a claim or refund; the manipulation of customer information in order to unlawfully obtain customer funds: fraudulent representations in sales and marketing activities: and embezzlement or theft of company or client assets;
- vi. Any other act(s) that the Management/Board of Directors found inappropriate, dishonest and contrary with the Company’s regulations and/or laws as imposed by the Authority(ies).

RESPONSIBILITIES OF THE EMPLOYEES

It is the responsibility of all employees to carry their work in such a way as to prevent fraud (or financial crime) occurring in the workplace. Employees must also be alert for occurrences of fraud, be aware that unusual transactions or behaviors could be indications of fraud and report potential case of fraud.

Employees must stay alert to the signs of fraud and report suspicion of fraud immediately, regardless of value to the Senior manager/Manager, or Designated Compliance Officer or anonymously via the company's website. The Board of Directors must immediately be notified if the alleged fraud involves manipulation, omissions or misrepresentation of financial reports/results.

- i. If your subordinate reports any suspected fraud then you should, in turn, report the matter to Board of Directors and/or Designated Compliance Officer;
- ii. Do not alert the suspected individual or other unauthorized persons in an effort to determine facts or suspicion. All cases of suspected fraud will be handled with utmost care/confidentiality;
- iii. Attend any relevant training programs provided by the Company to understand your obligations. Work in accordance with the Operating Principles;
- iv. Line Functions are required to establish and maintain sufficient controls to ensure that fraud risk is properly monitored and mitigated. All employees should adhere to relevant procedures in their areas of responsibility;
- v. Co-operate in investigations and do not willfully or knowingly state anything which you believe is false or you do not believe to be true.

DEALING WITH REPORTS OF SUSPECTED FRAUD (OR FINANCIAL CRIME)

The Company is committed to fraud control with an emphasis on proactive prevention, putting in place detection measured in its effort to reduce possibilities which could lead to fraud. We believe in zero tolerance to fraud. Thus, when a fraud is detected, suspected or alleged, we are committed to fully investigate the matter. We will work closely with the relevant authorities to ensure that justice is served and implement the relevant measures in order to recover as well as to minimize loss.

CONFIDENTIALITY

The Company treats all information received in pertaining to fraud (and financial crime) as strictly confidential. Any employee who suspects a dishonest or fraudulent activity must notify to the Board of Directors and should not attempt to personally conduct investigations or interview/interviews related to any suspected fraudulent act.

ACTIONS ARISING FROM FRAUD INVESTIGATIONS

Persons who are found to be guilty of fraud (and/or any other financial crime) will be dealt with in accordance with the Company's fraud policy. Proven allegation of fraud may result in dismissal (and any other action in accordance to the applicable laws & regulations).

REVIEW OF ANTI FRAUD (AND FINANCIAL CRIME) POLICY

GLOBAL CAPITAL MARKET LIMITED is committed to continuously improve this policy and it will be reviewed regularly (at least every six months) for effectiveness and updated.

This Anti Fraud (and Financial Crime) Policy is supported by management. GLOBAL CAPITAL MARKET LIMITED commits to providing this policy to all employee and displaying it in its business with clients.

Signed by :

Date :