

# TFC ANTI-FRAUD POLICY

At **TFC Ltd**, we are committed to maintaining the highest standards of integrity and transparency in all our business dealings. Our Anti-Fraud Compliance Programme is designed to prevent, detect, and respond to fraud and corruption, ensuring that we conduct our business ethically and in full compliance with applicable laws and regulations.

1. **Anti-Fraud Policy Statement.** Our anti-fraud policy is a core component of our commitment to ethical business practices. It outlines our zero-tolerance approach to fraud and corruption and sets the expectations for all employees, directors, and partners.
2. **Objectives.** The primary objectives of our Anti-Fraud Compliance Programme are:
  - 2.1. Prevention: To establish controls that reduce the risk of fraud occurring.
  - 2.2. Detection: To implement mechanisms that identify fraud if it occurs.
  - 2.3. Response: To ensure appropriate action is taken when fraud is detected, including investigation and disciplinary measures.
3. **Fraud Prevention**
  - 3.1. Internal Controls. We have established robust internal controls to mitigate the risk of fraud. These include:
    - 4.1.1. Segregation of Duties: Ensuring that no single individual has control over all aspects of any significant transaction.
    - 4.1.2. Authorization Controls: Requiring appropriate authorization for financial transactions.
    - 4.1.3. Access Controls: Restricting access to sensitive information and systems to authorised personnel only.
  - 3.2. Training and Awareness. We conduct regular training sessions for all employees to raise awareness about fraud risks and the importance of ethical behaviour. Topics include:
    - 3.2.1. Recognizing Fraud: How to identify potential signs of fraud.
    - 3.2.2. Reporting Mechanisms: How to report suspicious activities.
  - 3.3. Cybersecurity Measures. To further protect against fraud, we subscribe to Relentless Cyber Security Company on a yearly basis. This partnership enhances our ability to prevent and detect fraud through advanced cybersecurity measures, including:
    - 3.3.1. Network Security: Continuous monitoring and protection of our network infrastructure to defend against cyber threats.
    - 3.3.2. Threat Detection: Early detection and response to potential cyber threats and vulnerabilities.
    - 3.3.3. Employee Training: Specialised cybersecurity training for employees to recognize and respond to cyber threats, ensuring they are well-equipped to handle potential security breaches.
4. **Fraud Detection**
  - 4.1. Monitoring and Auditing. We employ continuous monitoring and periodic auditing to detect anomalies and irregularities. This includes:
    - 4.1.1. Internal Audits: Regular reviews of financial and operational processes.

4.1.2. Data Analytics: Using data analytics tools to identify unusual patterns.

4.2. Reporting Mechanisms. We have established clear channels for reporting suspected fraud. These channels are confidential and accessible to all employees, contractors, and partners.

5. **Fraud Response**

5.1. Investigation Procedures. When fraud is suspected or detected, we follow a structured process to investigate the matter thoroughly. This includes:

5.1.1. Immediate Action: Securing evidence and preventing further loss.

5.1.2. Investigation Team: Assigning a team to investigate the fraud allegation.

5.1.3. Documentation: Keeping detailed records of the investigation process and findings.

5.2. Disciplinary Actions. Appropriate disciplinary actions are taken against individuals found guilty of fraud. This may include termination of employment and legal action.

6. **Governance and Oversight**

6.1. Anti-Fraud Committee. We have established an Anti-Fraud Committee responsible for overseeing the implementation and effectiveness of the Anti-Fraud Compliance Programme. The committee comprises senior management and reports directly to the Board of Directors.

6.1.1. Immediate Action: Securing evidence and preventing further loss.

6.1.2. Investigation Team: Assigning a team

6.2. Policy Review. The Anti-Fraud Compliance Programme is reviewed annually to ensure its effectiveness and to incorporate any necessary updates based on emerging risks and regulatory changes.

7. **Commitment to Compliance.** At TFC Ltd, we are fully committed to maintaining the highest standards of ethical conduct and compliance with all applicable anti-fraud laws and regulations. Our Anti-Fraud Compliance Programme is an integral part of our corporate governance framework, and we continually strive to enhance our controls and procedures to prevent and address fraud effectively.

**Signatures**

Director 1: Name: **Daniel Templeman** Signature: \_\_\_\_\_ Date: 06/08/2024

Director 2: Name: **Leonie Templeman** Signature: \_\_\_\_\_ Date: 06/08/2024