

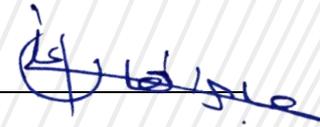


## ANTI-FRAUD POLICY

FNRCO – HR – 10|0123

  
Mari Jaber  
Reviewed By

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Date

  
Ali Jaber Al Mahan  
Approved By

4 January 2024  
Date

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		<b>HR – 10 0123</b>	<b>00</b>

## Policy Statement

- FNRCO is committed to upholding the highest standards of ethics and integrity in all aspects of our operations.
- We recognize the importance of preventing and detecting fraud to maintain trust with our customers and stakeholders.
- Fraud prevention is a shared responsibility among all employees and stakeholders of FNRCO.
- Any suspected fraudulent activity should be reported immediately to the designated authorities for thorough investigation.
- FNRCO will take swift and appropriate action against any individual or entity found to be engaged in fraudulent activities.
- We are dedicated to continuous improvement in our anti-fraud measures to safeguard our operations and reputation.
- This policy applies to all services provided by FNRCO, including Employee Secondment Services, Workforce Management Services, Supplemental Manpower Project (SMP), Global Mobility Services, Payroll Services Solution, Ajeer Employment Services, Employment of Record (EOR), and Managed Resources.

## Introduction

First National Human Resources Company (FNRCO) is a dynamic organization that is deeply committed to upholding the highest standards of ethics and integrity in all aspects of its operations. At FNRCO, we understand the critical importance of maintaining trust with our customers and stakeholders, which is why we place a strong emphasis on preventing and detecting fraud within the organization.

Our commitment to ethics and integrity is at the core of everything we do at FNRCO. We believe that conducting business with honesty and integrity is essential to building strong relationships with our clients, partners, and employees. Our dedication to transparency and accountability serves as the foundation of our organization, guiding us in all our interactions and decision-making processes.

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FNRCO recognizes that fraud prevention is a shared responsibility that involves every employee and stakeholder within the organization. We encourage open communication and collaboration to ensure that everyone is aware of their role in maintaining a fraud-free environment. By fostering a culture of integrity and accountability, we strive to create a workplace where fraudulent activities are not tolerated, and where all individuals are empowered to speak up and report any suspected instances of fraud.

### Fraud Prevention

Emphasizing the importance of preventing and detecting fraud is paramount for the success and integrity of First National Human Resources Company (FNRCO). Fraud can have detrimental effects on our operations, tarnish our reputation, and erode the trust of our customers and stakeholders. Therefore, it is imperative that all employees and stakeholders understand their shared responsibility in maintaining a fraud-free environment.

First and foremost, preventing fraud requires a culture of ethics and integrity within FNRCO. As an organization committed to continuous improvement, we must prioritize ethical behavior and hold ourselves to the highest standards of honesty and transparency. By promoting a culture of integrity, we set the tone for all employees and stakeholders to act ethically in all aspects of their work. This includes following policies and procedures, conducting business with honesty and fairness, and upholding the values of FNRCO.

Furthermore, detecting fraud is equally essential in safeguarding our organization against potential risks. All employees and stakeholders play a crucial role in identifying and reporting any suspicious activities that may indicate fraudulent behavior. This could include discrepancies in financial records, irregularities in transactions, or unusual patterns of behavior by employees or clients. By remaining vigilant and observant, we can prevent fraudulent activities from escalating and address them promptly.

Collaboration is key in preventing and detecting fraud within FNRCO. We must emphasize the shared responsibility among employees and stakeholders to uphold ethical standards and report any fraudulent activities. By working together, we can create a strong network of oversight and accountability that helps deter fraud and protect the interests of the organization.

### Reporting Suspected Fraud

To report any suspected fraudulent activity at First National Human Resources Company (FNRCO), employees and stakeholders are encouraged to follow the established procedure outlined below. It is crucial that any suspicions of fraud are reported promptly to the designated authorities for immediate investigation and resolution.

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### Procedure for Reporting Suspected Fraud:

1. **Recognize the Signs of Fraud:** It is essential for employees and stakeholders to be vigilant and aware of the common signs of fraud, such as unauthorized transactions, falsification of records, misuse of company resources, or discrepancies in financial statements.
2. **Report Suspicious Activity:** If any employee or stakeholder observes or suspects fraudulent activity within FNRCO, they must report it immediately to their direct supervisor, the HR department, or the designated compliance officer.
3. **Provide Detailed Information:** When reporting suspected fraud, individuals should provide as much detailed information as possible, including the nature of the suspected fraud, individuals or departments involved, relevant dates, and any supporting evidence or documentation.
4. **Maintain Confidentiality:** It is crucial to maintain confidentiality throughout the reporting process to protect the identity of the whistleblower and ensure a thorough and unbiased investigation.
5. **Immediate Action:** Upon receiving a report of suspected fraud, FNRCO will initiate a prompt and thorough investigation to determine the validity of the allegations. The investigation will be conducted by the appropriate authorities to ensure objectivity and integrity in the process.
6. **Protection Against Retaliation:** FNRCO is committed to protecting whistleblowers who report suspected fraudulent activities in good faith. Any form of retaliation against individuals who report fraud will not be tolerated and will be dealt with appropriately.

### Importance of Immediate Action:

#### Reporting suspected fraud immediately is crucial for several reasons:

1. **Prevent Further Damage:** Immediate reporting allows FNRCO to take swift action to prevent further fraudulent activities from occurring and minimize any potential financial or reputational damage.
2. **Preserve Evidence:** Timely reporting ensures that relevant evidence and information are preserved, making it easier to conduct a thorough investigation and gather necessary documentation.
3. **Hold Accountable:** Reporting suspected fraud promptly helps to hold individuals or entities accountable for their actions, discouraging future fraudulent activities within FNRCO.
4. **Maintain Trust**

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## Action Against Fraudulent Activities

FNRCO takes a firm stance on taking swift and appropriate action against individuals or entities engaged in fraudulent activities. We believe that fraud undermines the trust and integrity of our organization, and we are committed to upholding the highest standards of ethics and accountability in all our operations.

When fraudulent activities are discovered within FNRCO, we ensure that immediate action is taken to address the situation effectively and efficiently. Our priority is to protect the interests of our customers, stakeholders, employees, and the reputation of our company. We have established clear protocols and procedures to handle instances of fraud promptly and decisively.

Upon receiving a report or uncovering evidence of fraudulent behavior, FNRCO will launch a thorough investigation to gather all relevant information and facts surrounding the situation. This investigation will be conducted impartially and with the utmost confidentiality to ensure that all parties involved are treated fairly and respectfully.

If the investigation confirms that fraudulent activities have occurred, FNRCO will not hesitate to take appropriate disciplinary action against the individuals or entities responsible. This may include termination of employment, legal action, and cooperation with law enforcement authorities as necessary.

We are committed to zero tolerance for fraud and will not tolerate any form of dishonesty or unethical behavior within our organization. By taking swift and decisive action against fraudulent activities, we send a clear message to all employees and stakeholders that integrity and honesty are fundamental values that we uphold at FNRCO. Additionally, FNRCO will implement measures to prevent similar incidents from occurring in the future. We will review our existing policies and procedures, enhance controls, provide training and awareness programs, and continuously monitor and evaluate our anti-fraud measures to strengthen our defenses against fraudulent activities.

In conclusion, FNRCO's stance on taking action against individuals or entities engaged in fraudulent activities is unwavering. We are committed to maintaining a culture of transparency, honesty, and accountability within our organization, and will do everything in our power to prevent, detect, and address any fraudulent behavior that threatens the integrity and reputation of FNRCO.

## Continuous Improvement

Given the dynamic nature of the business landscape and the increasing sophistication of fraudulent activities, First National Human Resources Company (FNRCO) acknowledges the vital importance of continually enhancing its anti-fraud measures. Our commitment to

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continuous improvement in this area is unwavering, reflecting our dedication to safeguarding our operations and preserving our reputation as a trusted provider of human resources solutions.

In pursuit of continuous improvement, FNRCO actively engages in regular assessment and review of our existing anti-fraud policies, procedures, and controls. We understand that an effective anti-fraud program must evolve and adapt to address emerging risks and challenges. Therefore, we prioritize staying abreast of industry best practices, regulatory developments, and evolving fraud trends to ensure that our anti-fraud framework remains robust and effective.

Additionally, FNRCO places emphasis on fostering a culture of vigilance and accountability among all employees and stakeholders. We recognize that fraud prevention is not solely the responsibility of a dedicated compliance team but is a shared obligation that requires the active participation and commitment of every individual within the organization. By promoting awareness, providing regular training on fraud detection and prevention, and encouraging reporting of suspicious activities, FNRCO aims to create a united front against fraudulent behavior.

### Applicability

The anti-fraud policy statement for First National Human Resources Company (FNRCO) applies to all services provided by the organization. This means that the policies and procedures outlined in the anti-fraud policy statement are relevant and applicable to every aspect of FNRCO's operations, including but not limited to:

1. **Employee Secondment Services:** FNRCO's employee secondment services involve temporarily assigning employees to work for other organizations. This service requires a high level of trust and integrity to ensure that the employees are representing FNRCO's values and standards ethically.
2. **Workforce Management Services:** FNRCO's workforce management services involve helping organizations optimize their human resources and staffing needs. Fraud prevention is crucial in this service to ensure that the data and information provided to clients are accurate and reliable.
3. **Supplemental Manpower Project (SMP):** The SMP service provided by FNRCO involves supplying additional labor resources to organizations for specific projects.