

Fraud Policy

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Date

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SUMMARY

This policy aims to prevent, detect, and address cases of fraud within the Knowit Group. The company is committed to a zero-tolerance approach to fraudulent behavior and strives to protect its resources, reputation, and stakeholders from harmful actions.

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1. Definition of Fraud

Fraud is defined as a deliberate act carried out by one or more individuals to obtain undue or illegal advantages, including but not limited to:

- Misappropriation of assets.
 - False representation of facts.
 - Misuse of the company's resources or information.
 - Manipulation of financial reports.
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2. Scope

This policy applies to all employees, consultants, board members, suppliers, and other parties engaged in business relationships with the Knowit Group.

3. Responsibilities

- **Board of Directors:** Responsible for overseeing the company's risk management and ensuring effective controls are in place.
 - **Management:** Operationally responsible for implementing this policy, conducting regular risk assessments, and enforcing appropriate measures.
 - **Employees:** Obligated to report suspected fraud and adhere to the company's guidelines and controls.
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4. Preventive Measures

To mitigate the risk of fraud, Knowit implements the following measures:

- Regular ethics and fraud prevention training for all employees.
 - Strong internal control systems to detect and prevent fraudulent activities.
 - Continuous reviews and audits of financial transactions and processes.
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5. Reporting Suspected Fraud

Employees and other stakeholders are encouraged to immediately report any suspicions of fraud through one of the following channels:

1. **Manager or nearest leadership representative.**
2. **Anonymous whistleblowing function.**
3. **Knowit Group CFO and/or General Counsel.**

Whistleblower Protection: All reports are treated confidentially and individuals reporting are protected from retaliation.

6. Investigation of Suspected Fraud

In cases of suspected fraud, the following process will be followed:

1. **Receiving the Report:** The reported incident is documented and forwarded to the responsible investigation team.
 2. **Initial Assessment:** A quick assessment is conducted to determine whether a full investigation is necessary.
 3. **Investigation:** An independent investigation is carried out by internal audit or an external party, depending on the nature of the case.
 4. **Actions:** If fraud is confirmed, it may result in disciplinary measures, termination of employment, reporting to law enforcement, or other legal actions.
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7. Consequences of Fraud

Individuals involved in fraudulent activities will:

- Be held accountable under the company's disciplinary procedures.
- Be reported to law enforcement authorities if necessary.
- Be required to compensate for any damages or losses suffered by Knowit.