



ANTI-FRAUD AND FINANCIAL CRIME POLICY



A. POLICY OBJECTIVE

Kira Markets Limited ("the Company") is committed to upholding the highest standards of **openness**, **transparency**, and **accountability** in all its affairs. The Company fosters a culture of integrity, honesty, and zero tolerance towards fraud and financial crime in any form.

This policy aims to:

- Provide a clear definition of fraud.
- State the Company's strict prohibition of fraudulent activities.
- Outline employee responsibilities for preventing, detecting, and reporting fraud.
- Offer guidance on appropriate action when fraud is suspected.
- Specify roles and responsibilities for conducting fraud investigations.
- Protect employees who report fraudulent activities in good faith from victimization or retaliation.

B. WHAT IS FRAUD

Fraud is defined as an intentional act of deceit to secure an unfair or unlawful gain for oneself or others, or to cause loss to another party. Fraud may involve activities such as deception, bribery, forgery, extortion, corruption, conspiracy, embezzlement, misappropriation, or collusion.

B.1 TYPES OF FRAUD:

- **Theft:** Unauthorized removal or misuse of funds, cash, or assets.
- **False Accounting:** Deliberate falsification, concealment, or destruction of financial records for personal gain or to cause loss to the Company.

B.2 EXAMPLES OF FRAUD:

- Deliberate misstatement or falsification of financial information.
- Theft of trade secrets, intellectual property, or equipment.
- Use of false payment instructions, invoices, or cheques for unauthorized payments.
- Falsification of payroll records or fraudulent expense claims.
- Accepting or offering bribes or kickbacks.
- Acts of intermediaries, such as forgery, manipulation of client information, fraudulent representations in sales or marketing, or theft of company/client assets.
- Any other dishonest or inappropriate activity deemed unacceptable by the Management or Board of Directors

C. EMPLOYEE RESPONSIBILITIES

All employees are responsible for preventing, identifying, and reporting fraud or financial crime.

- **Be Vigilant:** Stay alert to unusual transactions or behaviors that may indicate fraud.
- **Report Suspicious Activity:** Immediately report any suspected fraud to the Senior Manager, Compliance Officer, or anonymously via the Company's reporting system.
 - Allegations involving manipulation of financial records must be reported to the Board of Directors.
- **Maintain Confidentiality:** Do not discuss suspicions with unauthorized individuals.
- **Follow Procedures:** Adhere to internal controls and procedures designed to mitigate fraud risk.
- **Cooperate Fully:** Participate in investigations and provide truthful information.

C.1 SUPERVISORY RESPONSIBILITY:

If a subordinate reports suspected fraud:

- Escalate the matter promptly to the Board of Directors and/or Compliance Officer.
- Ensure confidentiality is maintained and the subject of suspicion is not alerted.

D. REPORTING AND INVESTIGATING FRAUD

The Company adopts a **zero-tolerance approach** to fraud. When fraud is suspected, detected, or reported:

- **Immediate Action:** All cases will be thoroughly investigated.
- **Collaboration with Authorities:** The Company will cooperate with law enforcement and relevant authorities to ensure appropriate action.

Recovery Measures: Steps will be taken to recover losses and minimize future risks

E. CONFIDENTIALITY

The Company ensures that all reports and information concerning fraudulent activities are treated with the **strictest confidentiality**. Employees must refrain from conducting personal investigations or interviews. All suspicions must be directed to the Board of Directors or Compliance Officer.



F. ACTIONS RESULTING FROM FRAUD INVESTIGATIONS

Employees or third parties found guilty of fraud or financial crimes will face:

- Disciplinary actions, including **dismissal**.
- Legal action in accordance with applicable laws and regulations.

G. POLICY REVIEW

Kira Markets Limited is committed to continuous improvement of this policy. The policy will be reviewed **every six months** to ensure its effectiveness and relevance.