

Anti-Fraud Policy



December 2024

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1. Introduction

Mannai Corporation QPSC (hereinafter referred as the “Company”) is committed to conduct business in compliance with the principles established in its Code of Business Conduct & Ethics, its values, and the applicable laws and regulations.

The Company has zero tolerance to fraud and is committed to ensuring integrity, transparency and accountability across its businesses and operations.

2. Purpose

The purpose of this Anti-Fraud Policy (“the Policy”) is to set out the Company’s intent to prevent, detect and respond to fraudulent activities proactively. The Policy aims to promote a culture of honesty, ethical behavior and its obligation to comply with applicable laws and regulations.

3. Scope

The Policy is applicable to all employees and relevant stakeholders acting on behalf of the Company. Stakeholders include customers, partners, vendors, contractors, and consultants.

The Company expects its employees and stakeholders to adopt and follow similar standards of business conduct.

This Policy should be read in conjunction with other policies of the Company such as:

- Code of Business Conduct and Ethics
- Whistleblowing Policy and Procedures

4. Definitions

Fraud is an intentional act of deceiving others by falsifying or misrepresenting important information to gain illegitimate money or benefits at the expense of others.

Examples of fraudulent activities include, but are not limited to:

- Misrepresentation of Financial Statements: Intentional manipulation of financial records to misstate revenues, expenses, assets, or liabilities. Methods may include falsifying records, creating fictitious transaction, improper valuations, timing differences and concealing liabilities or expenses.
- Misappropriation of the Company Assets: Theft or misuse of Company’s assets such as cash, inventory supplies or other assets.
- Corruption: Engaging in unethical practices such as conflicts of interest, bribery, kickbacks and bid manipulation.
- Fraudulent Disbursement: This may include fraudulent billing, payroll, expense reimbursement, refunds, etc.
- Exploitation of Insider Knowledge: Misusing confidential information about the Company for personal gain.
- Assisting in Fraud: Helping other parties to commit fraud.

- **Forgery or Alteration of Documents:** This may include manipulation of records such as cheque, time sheets, invoices, proposals, agreements and contracts.
- **Improper Handling of the Company Property:** This includes destruction, removal, or inappropriate use of records, furniture, fixtures, equipment and other properties of the Company
- **Other Irregularities:** Any similar or related irregularity

5. Policy statements

- The Company upholds a zero-tolerance approach regarding fraud and prohibits all employees and relevant stakeholders to engage in any form of fraudulent activities.
- The primary responsibility for preventing and detecting fraud lies with all levels of management and those functions tasked with creating and upholding robust systems of internal controls and fraud detection measures.
- All levels of management must ensure the implementation and maintenance of effective procedures and controls to mitigate and identify fraudulent activities within their areas of oversight.
- Management at all levels should create an environment where fraud is not tolerated, identifying risk of fraud and taking appropriate actions to ensure that controls are in place.
- All employees and relevant stakeholders must ensure that they are aware of their responsibilities under this Policy and their obligations to immediately report all actual or suspected fraudulent activities.

6. Reporting procedures

- All employees and stakeholders must immediately report the suspected activity that could constitute fraud.
- While reporting suspected improprieties, one should adhere to the following:
 - a) He Should be acting in good faith and have reasonable grounds for believing the information provided.
 - b) Not to discuss this case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the Investigation team, his manager, or a government or regulatory agency; and,
 - c) Not to attempt to personally conduct investigations or interviews/interrogations related to any suspected fraudulent act.
- Suspected fraudulent activities shall be reported at compliance@mannai.com.qa
- Emails sent to compliance@mannai.com.qa will be delivered to the official email boxes of:
 - a) General Manager and Manager – Risk, Compliance and Internal Audit
 - b) Senior Legal Advisor
- The Company will identify and promptly investigate any suspected fraudulent or related dishonest activity. Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship to the Company. Such investigation will be conducted as per the procedures outlined in the approved "Whistleblowing Policy & Procedures" of the Company.
- The Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. All information received pertaining to the suspected fraud will be treated confidentially.
- Members of the Investigation Team will have free and unrestricted access to all of the Company's records, physical properties and personnel pertinent to investigating the suspected fraud.

- The Company shall obtain written statements during the investigation process from all relevant persons who are being interrogated with the incident of Fraud and such relevant persons shall be allowed to review their statements recorded upon completion and shall sign the statement acknowledging their statement.
- The Investigation officer/team shall submit their written report to the Management, which shall be signed by the Investigation officer/team upon completion of the investigation process.

7. Corrective actions

Employees who do not comply with the requirements of this Policy will be subject to the disciplinary action, up to and including termination of employment and legal proceedings.

For all other relevant stakeholders (e.g. customers, partners, vendors, contractors, and consultants), non-compliance of this Policy shall have serious consequences and may result in possible damage claims and legal proceedings.

8. Effective Date

This Policy will come into effect from the date of its publication on the Company's Website.

Approvals

Santhosh Krishnamoorthy CFO	
Alekh Grewal Group CEO	
H.E. Sheikh Khalifa Bin Abdullah Al Thani Chairman – Audit Committee	
H.E. Sheikh Suhaim Bin Abdullah Al Thani Vice Chairman – Board of Directors On behalf of the Board of Directors	