Fraud and Anti-Corruption Policy

1. Introduction

Shabeel Group is committed to maintaining the highest standards of ethics, integrity, and transparency in all its business activities. This Fraud and Anti-Corruption Policy outlines the principles and practices we uphold to prevent, detect, and respond to any form of fraud or corruption.

2. Scope

This policy applies to all employees, contractors, agents, partners, and stakeholders engaged in business with Shabeel Group. It covers all forms of fraud and corruption, including but not limited to embezzlement, bribery, extortion, misappropriation of funds, and misuse of company resources.

3. Definitions

- **Fraud**: The intentional act of deception intended to result in personal or financial gain at the expense of Shabeel Group.
- **Corruption**: The abuse of entrusted power for private gain, including bribery and extortion.

4. Responsibilities

- **Employees**: Every employee has a responsibility to report any suspected fraud or corruption, and to avoid activities that could lead to such occurrences.
- **Management**: Directors and senior management are responsible for establishing a culture of integrity, ensuring awareness of this policy, and implementing preventive measures.
- **Internal Audit & Risk Management Team**: Responsible for receiving and investigating all reported cases of fraud or corruption and ensuring appropriate actions are taken.

5. Reporting Procedures

Employees and other stakeholders should report any suspicion of fraud, waste, or misuse of company resources to the **Risk Management Director**, **Internal Audit Team**, or **Managing Director** via:

- Anonymous hotline: [+252611110888). All reports will be treated with strict confidentiality, and, where requested, anonymity will be maintained.

6. Investigation Process

Upon receipt of a fraud or corruption report, the Internal Audit and Risk Management teams will:

- Acknowledge the report.
- Conduct a thorough investigation.
- Take necessary corrective actions, which may include disciplinary measures, legal action, or restitution efforts.

7. Anti-Retaliation

Shabeel Group strictly prohibits retaliation against any individual who, in good faith, reports fraudulent or corrupt activities. Any employee found retaliating against a whistleblower will face disciplinary action, up to and including termination.

8. Preventive Measures

Shabeel Group implements various anti-fraud and anti-corruption measures, including:

- Regular financial audits and checks.
- Mandatory staff training on ethics and fraud prevention.
- Conflict of interest disclosures.

9. Consequences of Violating the Policy

Any employee or stakeholder found to be engaging in fraudulent or corrupt activities will face immediate disciplinary action, including potential termination, and, where applicable, legal prosecution.

10. Review and Updates

This policy will be reviewed annually and updated to ensure it reflects best practices and complies with relevant laws and regulations, including the Somali Data Protection Act.

Shabeel Group Anti-Retaliation Policy

1. Purpose
The purpose of this Anti-Retaliation Policy is to ensure that all employees, contractors, partners, and other stakeholders of Shabeel Group are protected from retaliation when they report concerns related to fraud, corruption, unethical conduct, or any violations of company policies and the law. This policy aims to encourage an open and transparent reporting culture where individuals feel safe to raise concerns without fear of retaliation.

2. Scope
This policy applies to all employees, contractors, and stakeholders of Shabeel Group,

regardless of their role or seniority. It covers any situation where an individual reports misconduct, including but not limited to:

- Fraud and corruption.
- Breaches of company policies or legal regulations.
- Health and safety violations.
- Discrimination, harassment, or unethical behavior.

3. Definition of Retaliation
Retaliation is any adverse action or treatment taken against an individual who, in good faith, reports a violation, concern, or misconduct. Retaliatory actions may include but are not limited to:

- Termination or suspension of employment.
- Demotion or loss of promotional opportunities.
- Unjustified negative performance evaluations.
- Harassment or discrimination.
- Threats, intimidation, or coercion.
- Reduction of salary or benefits.
- Exclusion from meetings, projects, or professional opportunities.

4. Reporting and Protection
Shabeel Group encourages individuals to report concerns regarding fraud, misconduct, or violations without fear of retaliation. The company is committed to protecting individuals who:

- Report concerns or violations in good faith.
- Participate in any internal or external investigation related to misconduct or violations.
- Refuse to engage in or assist in misconduct, fraud, or illegal activities.

All reports will be treated confidentially, and, if requested, anonymity will be maintained as much as possible.

5. Procedure for Reporting Retaliation
Any employee or stakeholder who believes they have been retaliated against for reporting misconduct or cooperating with an investigation should report the incident immediately to the **Human Resources Department**, the **Risk Management Director**, or the **Managing Director**. Reports can be made through:

- A confidential email: [email address]
- Anonymous hotline: [hotline number]
- Direct reporting to a senior manager or HR personnel.

6. Investigation of Retaliation Claims
All retaliation claims will be thoroughly investigated in a confidential and timely manner. The investigation process will involve:

- **Acknowledgment of Report**: Acknowledgment of receipt of the retaliation claim within 24-48 hours.
- **Investigation**: An impartial investigation conducted by the HR department and the Risk Management Director to examine the facts of the claim.
- **Confidentiality**: Maintaining the confidentiality of the claimant and the accused during the investigation.
- **Resolution**: Based on the findings, appropriate actions will be taken to address the retaliation. This may include disciplinary measures, reinstatement of affected rights, or additional training to prevent future incidents.

7. Consequences of Retaliation
Shabeel Group maintains a zero-tolerance policy for retaliation. Any individual found to have engaged in retaliatory actions against a whistleblower or anyone cooperating in an investigation will face disciplinary action, including but not limited to:

- Verbal or written warnings.
- Suspension or termination of employment.
- Legal action in cases of severe violations.

8. Good Faith Reporting
To be protected under this policy, reports must be made in **good faith**. Good faith means that the individual genuinely believes that the information they are reporting is true, even if it turns out to be incorrect. Reports made in bad faith (e.g., false accusations, malicious intent) may result in disciplinary action against the reporter.

9. Awareness and Training
Shabeel Group will ensure that all employees are aware of the Anti-Retaliation Policy. Regular training sessions will be conducted to inform employees of their rights and the procedures for reporting misconduct and retaliation.

10. Review of the Policy
This Anti-Retaliation Policy will be reviewed annually to ensure its effectiveness and compliance with any changes in applicable laws or company policies. Any amendments will be communicated to all employees and stakeholders.