

Chapter Fifteen





Policy and Procedures of Anti-Fraud

First: Objective:

The objective of this policy is to set standard procedures and measures within Takween Advanced Industries Company and its subsidiaries in cases in which an incident of fraud or embezzlement is discovered or suspected. Further, this policy defines the responsibilities of employees and officials in detecting or suspected incidents of fraud and reporting them.

Takween's policy focuses on uncovering any activity directed against Takween or any of its subsidiaries suspected to be fraud or dishonesty, and promptly investigating and prosecuting it with all available legal methods when necessary. Takween takes all appropriate disciplinary and regulatory measures against any employee involved in any dishonesty. These procedures may include informing the competent government agency and filing a criminal case when necessary.

These procedures specify the steps to be taken when fraud is suspected or any activity suspected to be dishonesty. These procedures also include the steps to be followed to detect and recover lost funds. When dealing with suspected acts of dishonesty, all employees and officials of Takween Company and its subsidiaries must act in accordance with the "Guide of Ethical Conduct and Relationships with Stakeholders" as well as in accordance with the professional rules and ethics in force at Takween, and they are all responsible. And accountable for that

Third: Definitions:

The definition of "fraud" includes a number of misleading offenses and misdemeanors that aim to deceive and may be committed in favor of or against the Company or its subsidiaries and by persons from within or outside the company or its subsidiaries

1. Fraud: Any act of dishonesty or roguery, including, but not limited to:

- (a) Falsification and illegal modification of official and statutory documents and records;
- (b) Adding false information or data to the documents.
- (c) Embezzlement, theft, or intentional sabotage of the assets of the Company or its subsidiaries.
- (d) Certification or signing on receipt of goods which are not delivered or services not provided.
- (e) Accepting bribes of all kinds.
- (f) Transferring any profitable transaction to the Company or its subsidiaries in such a way such transaction's profits are transferred to a third party or any of the Company's employees.
- (g) Collusion with other employees inside the Company or with other parties outside the Company to harm the interests of the Company or to prevent some other parties from benefiting.

2.. The employee: The term "employee" means any person who works in Takween Company or any of its subsidiaries on a full-time or part-time basis, and gets a salary from Takween or any of its subsidiaries in return for that.

3. **Management:** The term “management” means any supervisor, administrator, director, member of the board of directors, or any person responsible for managing and supervising employees.

Fourth: Management Responsibilities:

1. The Company’s Management shall be responsible for detecting illegal or fraudulent activities or acts of dishonesty that fall within the scope of its competencies. Every responsible person is required to be aware of all illegal acts falling within his jurisdiction and remain alert for any signs of fraud or dishonesty that have occurred or are occurring.
2. Management shall inform the Whistleblowing and Anti-Fraud Committee of any suspicious activity that may involve any act of fraud or breach of trust. The Director of any the department shall immediately contact this Committee by e-mail if necessary. The Management may not conduct any investigations, interrogations or interviews by itself. In all cases, Management remains responsible for taking appropriate corrective actions to ensure that adequate control measures are in place to not repeat such irregular activities.
3. The Management shall cooperate with the Whistleblowing and Anti-Fraud Committee in uncovering and investigating criminal activities. The Committee has the right to enjoy absolute freedom to review all records and conduct interviews with all employees without any restrictions. All assets, including offices and computers, are subject to inspection whenever there is reasonable suspicion of any activity requiring such inspection.
4. Utmost caution shall be exercised when dealing with activities suspected of being fraudulent or dishonest to avoid making false or misleading accusations, alerting suspected persons to conducting some investigations, dealing with employees unfairly, or making statements that may lead to sue the Company or its subsidiaries for false accusation or any other charges. Accordingly, disciplinary action shall be taken against anyone who may intentionally point false charges.
5. When dealing with any activities suspected to be fraud or dishonesty, the Director of any department in the Company shall take the following steps:
 - (a) Not to contact the suspected person (unless requested to do so) to find out the truth or to ask him/her to correct his/her situation. The director of any department, in speaking with the suspected person, shall not mention words such as “what have you done”, “crime”, “fraud” or “Forgery”
 - (b) Not to discuss such matter, the suspect, or the allegations with any person from outside the Company, unless the Whistleblowing and Anti-Fraud Committee specifically requested that in writing.
 - (a) Not to discuss the matter with anyone within the Company except for the employees who should be aware of the matter.
 - (b) Referring any inquiries from the suspect, his /her representative to the Violations and Fraud Control Committee; The response to such inquiries will be “I am not authorized to discuss such matters.”
 - (e) Submitting a report on the results reached to the Executive Management.

Fifth: The Employee's Responsibilities:

Any employee who detects, observes, or becomes aware of any activity suspected to be fraud or dishonesty should take the following steps:

1. Report the incident to his/her direct manager, who will in turn inform the Whistleblowing and Anti-Fraud Committee. In cases where the employee believes that his/her direct manager is involved in such illegal activity, he/ she shall directly and confidentially report the incident to the Violations and Anti-Fraud Committee.
2. After submitting such report, the employee shall not investigate the incident himself, entering into a confrontation with the suspect person, or discussing the incident with any other person unless the Commission on Violations and Anti-Fraud asks to do so.

Sixth: Anonymous Reporting and Reporting Policy:

1. The Company's reporting policy provides employees with a mechanism that allows them to confidentially report any suspected activity without revealing their identity, since the Whistleblowing and Anti-Fraud Committee accepts information from any employee suspects in any fraud or breach of trust on the basis of strict confidentiality.
2. Employees can report immediately, anonymously, of a suspicion of fraud or dishonesty using e-mail (wecare@takweenai.com). They should not personally attempt any investigation or any interview with the suspect regarding any fraudulent act
3. The findings of the whistleblowing and Anti-Fraud Committee shall not be viewed or discussed in any investigation except with persons within the Company whose job responsibilities and duties require knowledge of these results.

Seventh: Investigation Procedures:

Investigations into any fraud acts shall be conducted independently and professionally and in accordance with the relevant laws and regulations, with the aim of protecting the interests of both the Company and the suspected person, since suspicion does not mean his/her conviction until such crime is proven. Investigation procedures shall be varied according to the circumstances of each case and shall be determined by the whistleblowing and Anti-Fraud Committee:

This Committee shall investigate any cases suspected of fraud or dishonesty.

discusses the results of the investigations with the concerned department and submits its report to the competent authority.

the Whistleblowing and Anti-Fraud Committee shall fully coordinate with heads of other departments in the various stages of the investigation, as necessary.

Upon completion of the investigation, the results of the investigation shall be submitted to the competent authorities to determine whether there is a need to apply more control measures to reduce these risks in the future.

In the event that an employee is suspected of having been involved in some illegal business or fraud, the Human Resources Department shall be informed of the outcome of the investigation.

Eighth: Procedures for Investigating Fraud:

The final report prepared by the Whistleblowing and Anti- Fraud Committee shall include a summary of the findings and recommendations and / or actions taken by management to reduce the risks arising from facing such incidents and their recurrence.

In cases where the findings include recommendations to take legal and / or disciplinary action against a person, before taking any such action, the entire matter shall be referred to the Whistleblowing and Anti-Fraud Committee.

Ninth: Review and Update of The Policy and Procedures:

Policy and procedures shall be reviewed annually and amended by the whistleblowing and Fraud Committee as appropriate.