# Anti-Fraud and Anit-Corruption Policy

# Introduction

Kreative Gurus is committed to conducting its business with integrity, honesty, and transparency. We recognize the detrimental effects of fraud and corruption on our organization, our clients, and society as a whole. This policy outlines our commitment to preventing, detecting, and addressing fraud and corruption in all aspects of our operations.

# **Definitions**

#### **Fraud**

Any intentional misrepresentation, deception, or deceit for personal gain or to cause harm to the organization or its stakeholders.

## Corruption

Abuse of entrusted power for private gain, including bribery, extortion, embezzlement, collusion, and nepotism.

# **Principles**

## **Zero Tolerance**

Kreative Gurus has a zero-tolerance policy towards fraud and corruption in any form. All employees, contractors, and partners are expected to adhere to the highest standards of ethical conduct and comply with applicable laws and regulations.

### **Ethical Conduct**

We conduct all business activities with honesty, integrity, and fairness. We prohibit any actions that could compromise our ethical principles or damage our reputation.

#### Transparency

We promote transparency in our financial transactions, decision-making processes, and relationships with clients, suppliers, and other stakeholders.

# Responsibilities

#### Leadership commitment

Senior management is responsible for promoting a culture of integrity and compliance throughout the organization. They must lead by example and demonstrate unwavering commitment to anti-fraud and anti-corruption efforts.

# **Employee Obligations**

All employees are expected to familiarize themselves with this policy and comply with its provisions. They must report any suspected instances of fraud or corruption promptly and cooperate with investigations.

## **Due Diligence**

Kreative Gurus conducts due diligence on all third parties, including clients, suppliers, contractors, and business partners, to ensure they adhere to similar ethical standards and do not pose a risk of involvement in fraudulent or corrupt activities.

# Prevention and Detection

#### Risk assessment

We regularly assess the risks of fraud and corruption within our organization and implement appropriate controls to mitigate these risks.

#### Internal controls

We maintain robust internal controls over financial reporting, procurement, contracting, and other key processes to prevent and detect fraudulent activities.

### Whistleblower protection

We provide mechanisms for employees and stakeholders to report suspected instances of fraud or corruption anonymously and without fear of retaliation. Reports will be thoroughly investigated, and appropriate action will be taken.

# **Enforcements and Consequences**

# **Disciplinary action**

Violations of this policy will result in disciplinary action, up to and including termination of employment or contract, and legal action if warranted.

## Restitution

Individuals found guilty of fraud or corruption may be required to make restitution for any losses incurred by Kreative Gurus or affected parties.

# Training and Awareness

#### **Training programs**

We provide regular training and awareness programs to educate employees about the risks of fraud and corruption and their responsibilities in preventing and detecting such activities.

# Conclusion

Kreative Gurus is committed to maintaining the highest standards of integrity and ethical conduct in all our business activities. By adhering to this policy, we seek to safeguard our organization's reputation, protect our stakeholders' interests, and contribute to a more transparent and trustworthy business environment.

# **Kreative Gurus Leadership**

Alele E. Jeziel