



ANTI-FRAUD POLICY

1. Mission Statement

Communauté Minière de Walikale et Sangara (CMWS) operates ethically at all times and in every situation. We are committed to protecting CMWS, its assets, information, and reputation from fraud in all its forms while complying with all applicable anti-fraud laws and regulations in the jurisdictions where we conduct business. We demand the same commitment from all employees, contractors, officers, directors, third-party vendors, and everyone who does business on our behalf or with us.

2. Our Approach

In fulfilling this mission, we are guided by several principles:

- **Transparency and Ethics:** All business dealings must be transparent, ethical, and lawful regardless of counterparts, whether co-workers, commercial partners, government officials, or others.
- **Fraud Prevention:** Actively avoid and prevent potentially fraudulent behavior.
- **Conflict-Free Decisions:** Avoid decisions based on personal gain and prioritize CMWS's best interests in cases of conflict.
- **Encouragement to Report:** Encourage reporting of allegations or suspicions, take reports seriously, and ensure no tolerance for retaliation in any form.
- **Accurate Records:** Strive to maintain accurate records and correctly document all transactions.

- **Continuous Improvement:** Monitor and enhance performance to align with anti-fraud goals.
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3. Steps We Take

To meet these commitments, CMWS takes the following actions:

- Develop and implement supporting procedures, training, and internal reporting structures to embed this policy throughout the organization.
 - Provide anti-fraud and conflict of interest training for employees.
 - Create financial controls and processes to prevent and detect fraud and improper activities.
 - Establish anonymous hotlines for employees, third parties, and stakeholders to report fraud, conflicts, or corruption concerns.
 - Conduct assessments, testing, and audits (internal or external) to evaluate compliance and implement performance improvement action plans.
 - Communicate this policy widely, ensuring it is understood by employees, contractors, officers, directors, and third-party vendors, and make it publicly available.
 - Respond promptly and appropriately when violations are identified.
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4. Definition of Fraud

Fraud is any intentional, reckless, or negligent act performed to improperly or unfairly obtain a benefit. This includes but is not limited to:

- Misrepresentation in CMWS's public financial statements or disclosures.
 - Theft or misappropriation of CMWS's assets, such as money, equipment, or supplies.
 - Unlawfully obtaining revenue or avoiding costs.
 - Commercial bribery, bribery of government officials, or violating anti-corruption laws or CMWS's Anti-Bribery Policy.
 - Accepting or seeking kickbacks or gifts to influence business decisions.
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5. Reporting Fraud

All potential violations of this policy must be reported to Business Integrity and Ethics (BIE), Legal personnel, management, or through the anonymous hotline. Details on reporting are also available in CMWS's Code of Business Conduct and Ethics.

6. Fraud Matter Management

Once a report is submitted:

- Business Integrity and/or Legal personnel review the report, assess its severity, and determine investigative steps with relevant functions.
 - Investigations may involve record reviews, interviews, and external resources if necessary.
 - Findings are assessed, and disciplinary actions may be implemented after consultation with senior management.
 - Allegations and outcomes are reported quarterly to CMWS's Board of Directors and leadership.
 - Anonymity and confidentiality are maintained throughout the investigative process.
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7. Conflict of Interest

Conflicts of interest arise when personal interests compromise professional objectivity. Examples include:

- Serving as a director/officer of a competitor or business partner.
- Investing in suppliers or trading competitor shares.
- Owning interests in potential business partners.

All potential or perceived conflicts must be reported via the hotline, the GAN system, or to Business Integrity and Legal personnel.

8. Government-Related Obligations

Interactions with government officials or agencies must adhere to CMWS's Anti-Bribery and Anti-Corruption Policy. This includes:

- Security-related support, travel, accommodations, meals, entertainment, or per diems.
 - Donations or contributions to charitable, cultural, or political entities.
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9. Policy Scope

This policy applies to all CMWS employees, contractors, officers, directors, and third-party vendors across all sites. It supplements applicable laws, corporate policies, and CMWS's Code of Business Conduct and Ethics.