

Fraud Policy

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Version III



Version #	Prepared By	Reviewed By	Review Date
1	M.R Haroon	Adeel Salman	15/10/2018
2	John Tomlinson	M.R Haroon & Adeel Salman	10/06/2020
3	Vincent Bull	M.R Haroon & Adeel Salman	16/06/2025

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FRAUD POLICY

1. POLICY STATEMENT

DEX International Ltd is committed to conducting its business with honesty and integrity. We will not tolerate any form of fraud, corruption, or dishonesty. This policy outlines the framework to prevent, detect, and respond to fraud across the business, in accordance with the FCA Handbook and UK legal obligations.

2. PURPOSE AND SCOPE

This policy applies to all employees, contractors, agents, and third parties working on behalf of DEX International Ltd. It covers all business functions and jurisdictions in which the company operates.

3. DEFINITION OF FRAUD

Fraud is the use of deception with the intention of obtaining an advantage, avoiding an obligation, or causing loss to another party. It may include acts such as bribery, theft, forgery, false representation, extortion, collusion, and concealment of material facts.

4. CATEGORIES OF FRAUD

- a) Internal Fraud - committed by staff, including misuse of assets and false accounting.
- b) External Fraud - committed by individuals outside the organisation, including hacking and scams.
- c) Collusion - involving internal and/or external parties working together to commit fraud.

5. EXAMPLES OF FRAUDULENT ACTIVITY

- Advance fee frauds
- Bogus invoices
- Computer hacking
- Corruption and bribery

- Counterfeiting and forgery
- Credit card fraud
- False accounting
- Internet scams
- Investment fraud
- Money laundering
- Payroll fraud
- Pyramid schemes
- Mortgage fraud
- Misappropriation of assets

6. RESPONSIBILITIES

- The Board is responsible for overall governance and risk management.
- The MLRO ensures financial crime systems and controls are in place.
- Managers must enforce controls and escalate suspected fraud.
- Employees must act ethically and report any concerns.

7. PREVENTION AND DETECTION

DEX International Ltd implements internal controls, training, system monitoring, and separation of duties to minimise fraud risk. A culture of openness and accountability is promoted.

8. REPORTING AND INVESTIGATION

Suspected fraud should be reported immediately to the MLRO or Compliance Officer. All allegations will be investigated confidentially and thoroughly. Action may include disciplinary measures or legal proceedings.

9. TRAINING AND AWARENESS

All employees receive training on fraud awareness and reporting obligations. Ongoing education will be provided to keep staff informed of emerging threats.

10. REVIEW AND GOVERNANCE

This policy will be reviewed annually or in response to regulatory changes. Revisions must be approved by the Board or designated committee.