



TAN CHONG MOTOR HOLDINGS BERHAD

197201001333 (12969-P)

FRAUD PREVENTION POLICY (“FPP”)

	Designation	Date
Approved By:	Board of Directors of Tan Chong Motor Holdings Berhad	23 Jan 2013
First Revision Date:	24 May 2021	Rev #: 1



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1. INTRODUCTION AND OBJECTIVES

Tan Chong Motor Holdings Berhad Group of Companies (TCMH Group) is an investment holding company and the Group’s current principal activities include assembly and distribution of motor vehicles, provision of after-sales services and motor related financial services such as hire purchase, insurance agency and leasing.

The Group Human Resources (GHR) of TCMH Group has developed a Code of Business Conduct and Ethics (CBCE) in order to promote ethical conduct and work ethics within TCMH Group. This code is publicly displayed and available on its TCMH Group’s Intranet.

In order to embed the CBCE in the daily operations of TCMH Group, it was decided that it is necessary to develop and implement a Fraud Prevention Policy (“FPP”).

The FPP provides all Personnel and stakeholders of TCMH Group with:

- Insight and information regarding the various initiatives that will be considered and/or implemented in order to mitigate the risk of fraud, corruption and other irregularities;
- What actions the management of TCMH Group will take to address all matters reported in respect of fraud, corruption and other irregularities; and
- Mechanisms to report to management and to assist management with all instances of fraud, corruption and other irregularities.

2. SCOPE OF THE POLICY

TCMH Group requires all Personnel and other stakeholders such as contractors and suppliers of TCMH Group to act **honestly** and with **integrity** in all activities undertaken for and on behalf of TCMH Group at all times. TCMH Group takes a zero tolerance approach towards fraud and corruption. Therefore, all incidents relating to fraud and corruption will be thoroughly investigated and, where appropriate, those incidents will be reported to the relevant authorities (such as the Royal Malaysian Police and the Malaysian Anti-Corruption Commission) for further action. TCMH Group will also institute appropriate actions against any Personnel and other



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stakeholders who are proven to be involved in or in collaboration with those involved in such incidents.

3. DEFINITIONS AND ABBREVIATIONS

3.1. In addition to the words already defined herein and unless the context requires otherwise, the following words and expressions shall have the following meanings:

ABAC	TCMH Anti-Bribery and Anti-Corruption Policy
AC	TCMH Audit Committee
BOD	TCMH Board of Directors
CBCE	TCMH Code of Business Conduct and Ethics
Corruption	Dishonest activity in which TCMH Group Personnel and other stakeholders act contrary to the interests of TCMH Group and abuses his/her position of trust in order to achieve some personal gain or advantage for him or herself or for another person or entity. <i>(Adapted from the Australian standard for Fraud and Corruption Control (AS 8001-2008) by TCMH Group)</i>
DI	Domestic Inquiry
FPP	TCMH Fraud Prevention Policy
Fraud	Dishonest activity, by TCMH Group Personnel and other stakeholders, causes actual or potential financial loss to TCMH Group, including the theft of money or other property of TCMH Group. This includes the deliberate falsification, concealment, destruction or improper use of documentation used for a normal business purpose or the improper use of other information of position. <i>(Adapted from the Australian standard for Fraud and Corruption Control (AS 8001-2008) by TCMH Group)</i>
GCs	<u>Governing Committees (GCs)</u> There shall be Governing Committees set up to assist in the implementation of this policy. The TGIO shall in consultation with TCMH Group’s President set up such Governing Committee(s) such as the SCC and ICC as deemed appropriate with specific composition and responsibilities.



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GHR	Group Human Resources
GIA	Group Internal Audit
ICC	Incident Control Committee
In-house Investigation Unit	An in-house investigation unit set up under Clause 8 of this Policy with investigative responsibilities to probe into matters relating to fraud and corruptions within the TCMH Group.
IO	<u>Investigating Officer (IO)</u> A person appointed by the Head of Investigative Function to undertake a specific investigation in accordance with the mandate given by the TGIO or Chairman of AC (in the event the TGIO is implicated in the report).
IR	Industrial Relations
MACC	Malaysian Anti-Corruption Commission
PDRM	Royal Malaysian Police (Polis Di Raja Malaysia)
Personnel	Individuals who are employed by or serving TCMH Group at all levels and grades whether on permanent, contract, secondment, temporary or assignment basis including interns, trainees, workers, executives, supervisors, managers, officers, consultants and directors (executive and non-executive) wherever they are located.
President	means President of TCMH
Reporting Channel	A channel available on the intranet and business website with a dedicated toll free line, an email address and an online complaint form for Personnel and other stakeholders to report any alleged or suspected fraud, corruptions or non-compliance with CBCE, Governance Documents and laws and regulations directly to the TGIO. Such communication can be done confidentially or anonymously.
SCC	Special Cases Committee
SCP	Special Complaint Policy
TCMH	Tan Chong Motor Holdings Berhad [Registration No. 197201001333 (12969-P)]



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TCMH Group	TCMH, its subsidiaries, and companies or organisations of which TCMH directly or indirectly has a controlling interest, or has shares to the total value of not less than thirty per centum (30%) of the total issued capital of the companies or organisations.
TGIO	<u>TCMH Group Integrity Officer (TGIO)</u> An individual amongst TCMH’s senior management team appointed by the TCMH Board of Directors based on the recommendation of TCMH’s President to perform TCMH Group integrity and compliance functions. He is given the mandate to receive all allegations or complaints regarding TCMH Group; initiate and oversee all investigations; ensure investigation findings are deliberated and decided by the Governing Committee; and reporting to the TCMH Group’s President and Audit Committee.

4. RESPONSIBILITIES

All matters reported in accordance with the FPP will be treated confidentially and anonymously. Any individual who does not comply with this policy will be subjected to the necessary disciplinary, civil and/or criminal action. Further responsibilities are set out as follows:-

a. TCMH’s Group Integrity Officer (TGIO)

The TGIO is the custodian of this FPP and ultimately responsible for ensuring that the FPP and its objectives are embedded in the daily operations of TCMH Group.

The TGIO is given the mandate to receive all allegations or complaints regarding TCMH Group; initiate and oversee all investigations; ensure investigation findings are deliberated and decided by the Governing Committees and make periodical reporting to TCMH Group’s President and Audit Committee.



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The TGIO is also authorized to make, amend and revoke any, Standard Operating Procedures or Guidelines in respect of all such matters as are necessary or desirable in pursuance of the execution and implementation of the roles and functions of the FPP.

b. Governing Committees

In order to ensure effective utilization of the TCMH Group resources and the implementation of the FPP, the TGIO shall in consultation with TCMH Group’s President set up Governing Committee(s) such as the Special Cases Committee (SCC) (please see Appendix G) and the Incident Control Committee (please see Appendix H) each with its own composition, jurisdiction and scope.

The main duties and responsibilities of the Governing Committee (GC) are as follows:

- Review, examine and evaluate the investigation findings presented by the Investigating Officer;
- Seek further information and clarification from the Investigating Officer of the case, if necessary;
- Challenge and determine the adequacy of the evidence to conclude on the allegations; and
- Decide on the actions to be taken on the case presented, i.e. request for further investigation, close the case or agree on the appropriate follow-up actions (e.g. sanctions and/or disciplinary actions) including accountability for the actions.

The decisions made by the GC shall be based on consensus. Where there is no consensus, the decision shall be based on the majority view. However, where there is no majority view, the Chairman of GC shall decide.

The Secretary will document the decisions made by the Governing Committee(s) (including any agreed rationale for the decisions) in the minutes of meeting. The minutes of meeting shall be reviewed and approved by the GC Chairman before being disseminated to the members of the GC and invitees for that meeting for their reference.



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c. All Personnel and Stakeholders

In terms of the FPP, all Personnel and stakeholders are required to:-

- Maintain a culture of zero tolerance towards fraud and corruption and utmost honesty and integrity;
- Consciously refrain from directly or indirectly participating in any fraud and corruption practice and always act in the best interests of TCMH Group;
- Report all actual or potential incidents of fraud, corruption and other irregularities of similar nature;
- Give full cooperation to the Investigating Officer by truthfully disclosing all matters related to the incident either verbally or in writing and producing any document when required by the Investigating Officer. Any person knowingly giving false or fictitious statement or information whether verbally or in writing or willfully refusing to produce any document when required, may be subject to disciplinary action;
- Assist to investigate, when required, any incidents of actual or potential fraud, corruption and other irregularities as well as to provide affidavits for and/or testimony at legal/disciplinary proceedings arising from such investigations;
- Ensure that they understand and operate all controls, systems and processes of TCMH Group in order to mitigate the risk of fraud, corruption and other irregularities;
- Ensure that effective controls and processes are implemented and adhered to and to provide recommendations to improve current controls or processes in order to mitigate the risk of fraud, corruption and other irregularities;
- Take all necessary steps to prevent fraud, corruption and other irregularities.



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5. NON-COMPLIANCE WITH THE FPP

It is the responsibility of the TGIO to make the Personnel and stakeholders aware of the FPP and to ensure that the FPP is implemented. All Personnel and stakeholders will be required to comply with the FPP. Where necessary it is recommended that all Personnel and stakeholders liaise with representatives of the Governing Committees in order to understand the contents of the FPP. If any individual to whom the FPP is applicable fails to comply with the FPP, he/she may be subjected to disciplinary, criminal and/or civil action, where applicable.

6. REPORTING OF FRAUD

All Personnel and stakeholders are encouraged to report through the Reporting Channel as listed in **Appendix E** on any matters relating to any suspected fraud and corruption or any non-compliance to Company’s CBCE, Governing Document, policies and/or applicable laws or regulations. The TGIO will ensure the confidentiality of the contents as well as the identity of the person who reports. In line with this, a Special Complaint Policy shall concurrently be established to provide protection and confidentiality of each matter reported as well as the identity of the complainant.

7. CONFIDENTIALITY AND PROTECTION

All Personnel and stakeholders operating within the FPP are entitled to confidentiality and protection against victimization. However, this will be subjected to disciplinary, civil and/or criminal processes governed by the policies of TCMH Group and relevant legislations in Malaysia or any other jurisdictions that TCMH Group operates. It should be noted that if any disclosure or matter reported in accordance with the FPP is with malicious intent or not a bona-fide report, then the confidentiality and protection accorded under this FPP or the Special Complaint Policy will not be applicable.



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8. EMPOWERMENT

In the pursuance of executing the roles and functions of the FPP, an in-house investigation unit with investigative responsibilities to probe into matters relating to fraud, corruption and malpractices within the TCMH Group shall be established and for the purpose of carrying out its obligations hereunder the Investigating Officer shall be empowered to:

- 1) Have unrestricted access to all functions, systems, records, property, Personnel within and premises of TCMH Group.
- 2) Have full and free access to GC Chairman and members.
- 3) Design its annual Investigation plan, select review areas, determine scope of work and apply the techniques required to accomplish its objectives.
- 4) Obtain the necessary assistance from the Personnel and any other specialist from external services as and when required.

The Head of the In-house Investigation Unit shall be administratively reporting to the President’s Office and functionally reporting to the TGIO and the Governing Committee(s).

9. INVESTIGATION

Head of Departments/Business Units should be alert on the possibility that unusual events or transactions can be symptoms of fraud or attempted fraud. Fraud may also be highlighted as a result of specific management checks or be brought to management’s attention by a third party.

It is the Department/Business Units’ responsibility to ensure that there will be consistent handling of all suspected fraud cases without regard to position held or length of service.

Irrespective of the source of suspicion, it has to be promptly reported to the Reporting Channel, to TGIO, or in the event TGIO is implicated in the report, to the Chairman of AC for them to take any appropriate actions in order to ascertain the facts and to confirm



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or repudiate the suspicions. Do not attempt to investigate the information/allegations on your own. Please refer to Fraud Response Flowchart (**Appendix F**).

If the initial examination confirms the suspicion that a fraud has been perpetrated or attempted, the information/allegations shall be taken up by the In-house Investigation Unit for a full investigation.

10. DISCIPLINARY ACTION

In all cases where it is considered appropriate, the Governing Committee(s) will upon the completion of a full Investigation, provide advice and direction on the appropriate legal and/or disciplinary action to be taken.

Any Personnel found guilty of a criminal act will be considered to have committed a serious disciplinary offence and to be dismissed from the Department/Business Unit on grounds of gross misconduct.

The follow-up actions on the above legal and/or disciplinary action shall be carried out by the respective Department/Business Unit, after consultations with and advice from the Head of Group Human Resources or Head of Group Legal of TCMH, following the due process of the law.

Where supervisory negligence is found to be a contributory factor, disciplinary action may also be initiated against those managers/supervisors accountable.

As part of the FPP, all cases of fraud, whether perpetrated or attempted by any Personnel or by external organizations or person, may be referred to the relevant authorities.

Losses resulting from fraud should be recovered, subject to the policy on write-offs, if necessary through civil action.



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11. GROUP INTERNAL AUDIT

Group Internal Audit of TCMH Group is responsible for the provision of an independent and objective opinion regarding management’s adequacy of managing fraud risk.

Internal auditors are alert, in all their works, to risks and exposures that could give rise to fraud. Therefore, all audit assignments are planned and prioritized to assist in deterring and preventing fraud by examining and evaluating the effectiveness of control which is commensurate with the extent of the potential exposure/risk. Risk and Control Frameworks are also reviewed as a constituent part of each audit assignment to ensure that the management has reviewed the risk exposures and, where appropriate, identified the possibility of fraud as a business risk.

12. CONCLUSION

It is understood that the circumstances of individual fraud will vary. TCMH Group takes fraud very seriously and will ensure that all cases of actual or suspected fraud, including attempted fraud, are vigorously and promptly investigated and that appropriate legal, disciplinary and/or remedial actions are taken. Managers should be fully aware of their responsibilities to protect company funds and as such, should always be alerted to the potential fraud.

Any queries in connection with the FPP should be directed to the TGIO. This FPP is also to complement the Anti-Bribery and Anti-Corruption (ABAC) Policy. If there is any conflict between the FPP and the ABAC, the ABAC shall prevail.



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APPENDIX A- Examples of Fraud Controls and Initiatives

The following is a list of initiatives and controls that will be considered by TCMH Group to create awareness of the FPP and to mitigate the risk of fraud, corruption and other irregularities. It should be noted that this list must not be seen as a complete list of such initiatives and controls, but rather an indication of the types of initiatives and controls that will be considered.

Awareness initiatives

- Awareness workshops and initiatives will be considered by the TGIO and/or GHR
- Annual declarations will be signed by all Personnel as evidence that they are aware of the contents of the FPP
- Relevant marketing material such as posters and emails will be circulated to create awareness of the FPP

Initiatives and controls relating to the organization

- Ensure that proper policies and processes are in place which are regularly reviewed and amended as required
- Ensure that all stakeholders are aware and understand the contents of the relevant policies applicable to their environment
- Ensure that a culture of ethical business conduct is embedded in the organization
- Ensure that the Group Risk Management is in conjunction with management to assess the effectiveness and relevance of all controls, systems and processes, through initiatives such as fraud risk assessments and integrated & risk based internal audits

Initiatives and controls relating stakeholders

- Pre-employment screening, probity, vetting and background checks will be considered before the appointment of new Personnel and service providers
- Conflicts of interest declarations will be signed before the adjudication of awarding of tenders or proposals
- Declarations in respect of private work conducted external to TCMH Group will be signed on a regular basis
- Personnel will be encouraged to take compulsory leave on an annual basis
- The appointment of service providers will be done once best practice procurement processes have been followed

Enforcement of the FPP

- Ensure regular review of the FPP
- Ensure success of the current FPP and its relevant initiatives via feedback from stakeholders
- Ensure independent and surprise reviews of high risk processes and transactions
- Ensure regular monitoring and data mining of transaction data in order to identify potential high risk matters which would require further investigation



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Appendix B – Examples of Fraud and Corruption

The following list is not exhaustive but includes certain generic examples of fraud and corruption:

Theft of assets, such as:-

- Equipment
- Consumables or supplies
- Cash
- Information
- Intellectual property
- Workers’ compensation reimbursement

Unauthorized or illegal use of assets, information or services for private purposes, including:

- Computers, including email and the internal documents
- Motor vehicles
- Clerical and other support
- Confidential information
- Equipment, including photocopiers, telephones and fax machines
- TCMH Group name or logo e.g. through use of letterhead or staff authority/access card

Abuse of position and power for personal gain, such as:

- Seeking and obtaining bribes or other gifts in exchange for favourable treatment
- Nepotism in staff appointments

Manipulation and misuse of account payments, such as:

- Fictitious Personnel on the payroll
- Ordering equipment for private and personal use
- Favouring suppliers whose costs/products are not as competitive as other suppliers
- Favouring suppliers who have a personal relationship with the Personnel

Falsification of records, including:

- Timesheets
- Travel claims
- Purchase orders
- Petty cash vouchers

Manipulation of computer programmes for improper purposes, such as:

- Unauthorized approval to pay
- Diversion of proceeds
- Writing off debts



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Appendix C - Indicators of Fraud/Red Flags

- | | |
|--|---|
| <ul style="list-style-type: none">• Missing expenditure vouchers and unavailable official records• Crisis management coupled with a pressured business climate• Profitability declining• Excessive variations to budgets or contracts• Refusals to produce files, minutes or other records• Related party transactions• Increased Personnel absences• Borrowing from fellow Personnel• An easily led personality• Covering up inefficiencies• Lack of Board oversight• No Supervision | <ul style="list-style-type: none">• Unauthorized changes to systems or work practices• Personnel with outside business• Staff turnover is excessive• Figures, trends or results which do not accord with expectations• Bank reconciliations are not maintained or can't be balanced• Excessive movement of cash funds• Multiple cash collection points• Remote locations |
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Appendix D – Examples of Good Management Practices which Assist in Combating Fraud

- All income is promptly entered in the accounting records with the immediate endorsement of all cheques
- Regulations governing contracts and the supply of goods and services are properly enforced
- Accounting records provide a reliable basis for the preparation of financial statements
- Controls operate which ensure that errors and irregularities become apparent during the processing of accounting information
- A strong internal audit presence
- Management encourages sound working practices
- All assets are properly recorded and provision is made known or expected losses
- Accounting instructions and financial regulations are available to all Personnel and are kept up to date
- Effective segregation of duties exists, particularly in financial accounting and cash/securities handling areas
- Close relatives do not work together, particularly in financial, accounting and cash/securities handling areas
- Creation of an agency climate to promote ethical behavior
- Act immediately on internal/external auditor’s report to rectify control weaknesses
- Review, where possible, the financial risks of Personnel
- Issue accounts payable promptly and follow-up any non-payments
- Set standards of conduct for suppliers and contractors
- Maintain effective security of physical assets; accountable documents (such as cheque books, order books); information, payment and purchasing systems
- Review large and unusual payments
- Perpetrators should be suspended from duties pending investigation
- Proven perpetrators should be dismissed without a reference and prosecuted
- Query mutilation of cheque stubs or cancelled cheques
- Store cheque stubs in numerical order
- Undertake test checks and institute confirmation procedures
- Develop well defined procedures for reporting fraud, investigating fraud and dealing with perpetrators
- Maintain good physical security of all premises
- Randomly change security locks and rotate shifts at times (if feasible and economical)
- Conduct regular appraisals of Personnel
- Review work practices open to collusion or manipulation
- Develop and routinely review and reset data processing controls
- Regularly review accounting and administrative controls



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- Set achievable targets and budgets and stringently review results
- Ensure Personnel take regular leave
- Rotate Personnel from their job functions
- Ensure all expenditure is authorized
- Conduct periodic analytical reviews to highlight variations to norms
- Take swift and decisive action on all fraud situations
- Ensure Personnel are fully aware of their rights and obligations in all matters concerned with fraud

Appendix E – Reporting Channel Details

Mode	Description
<i>E-mail (Hotmail)</i>	<i>compliance@tanchonggroup.com</i>
<i>Toll Free Line (Hotline)</i>	<i>1800-888-245</i>
<i>Online form (Hotform)</i>	<i>http://tccompliance.tanchong.com.my/tc_compliance_form/</i>
<i>Send Report to: (if TGIO is implicated in the report)</i>	<i>The Chairman of AC, c/o Group Secretarial at No.62-68, Jalan Sultan Azlan Shah, 51200 Kuala Lumpur.</i>



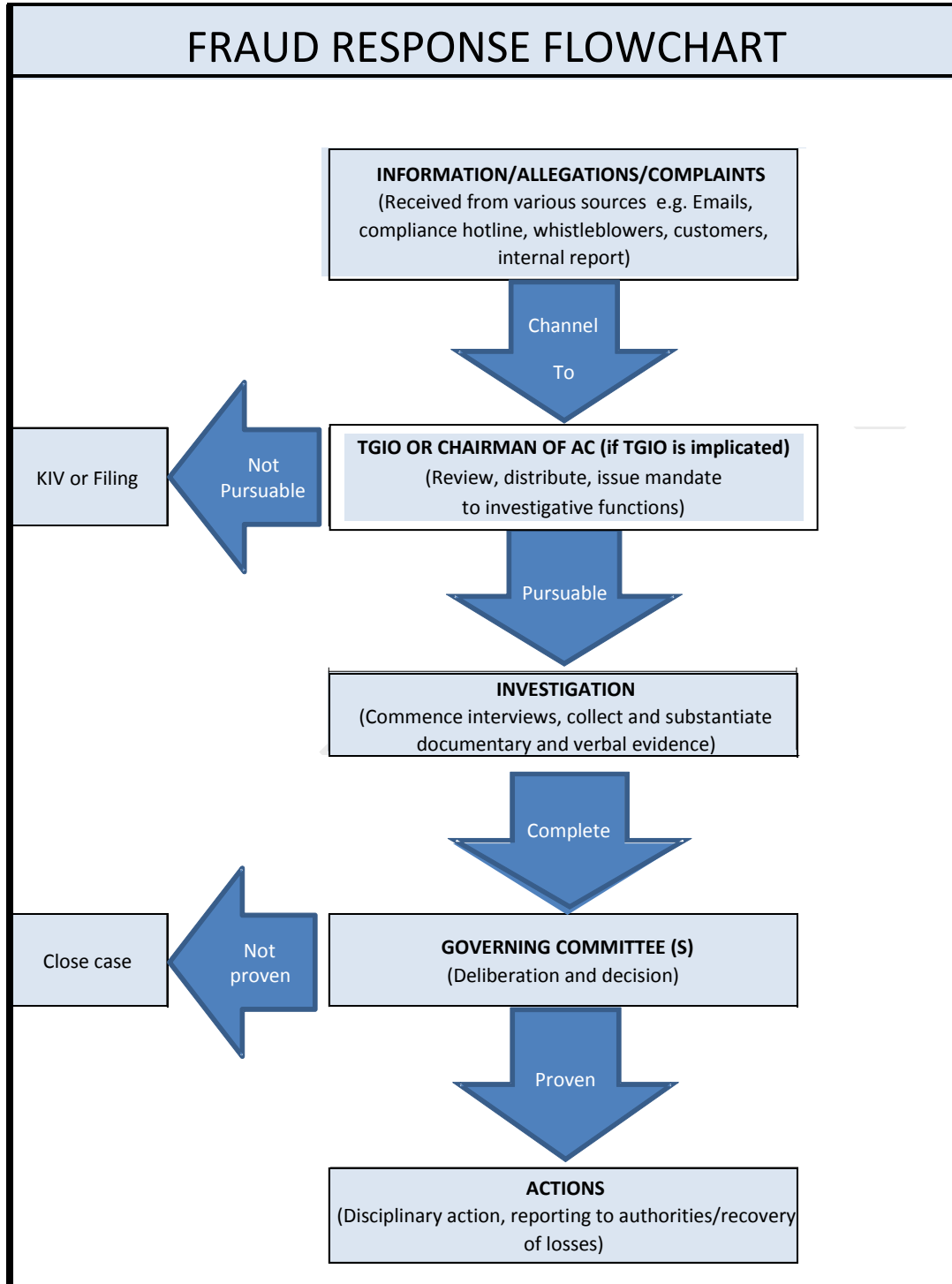
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APPENDIX F – FRAUD RESPONSE FLOWCHART





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APPENDIX G– Special Cases Committee (SCC) Jurisdiction and Composition

- **Jurisdiction of SCC**

- Any alleged fraud or non-conformance to Company Code of Conduct, Governing Document and/or applicable laws and regulations that:
 - ✓ Involve any Personnel holding position of Deputy General Manager and above, and include any member of the Board of Director and Audit Committee; or Has a potential financial impact of more than RM50,000; or
 - ✓ May have an appreciable negative impact on TCMH Group’s reputation e.g. those brought to public attention, media coverage or those under investigation by authorities like PDRM and MACC.
- Any alleged violation that may necessitate special precautions to protect the confidentiality of the informant and/or are of a sensitive nature or warrant special privacy consideration;
- All claims and recovery for damages/losses suffered by the company as a result of fraud or non-conformance to Company Code of Conduct, Governing Document and/or applicable laws and regulations.

- **Composition (SCC)**

1.	Co-Chairman
2.	Co-Chairman
3.	Secretary (TGIO)
4.	Head of Group Legal
5.	Representative from President’s Office
6.	Head of Group Human Resource (GHR)
7.	Head of Group Internal Audit (GIA)
8.	Chief Financial Officer (CFO)
9.	Appointment by President
10.	Relevant party upon invitation (as and when required)



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APPENDIX H– Incident Control Committee (ICC) Jurisdiction and Composition

- **Jurisdiction of ICC**
 - All other fraud or non-conformance cases not deliberated by SCC
- **Composition (ICC)**

1.	Chairman (TGIO)
2.	Secretary (to be appointed by TGIO)
3.	Representative from President’s Office
4.	Head of Group Legal or Representative
5.	Head of Group Human Resources (GHR) or Representative
6.	Head of Group Internal Audit (GIA) or Representative
7.	Appointment by President
8.	Relevant party upon invitation (as and when required)

APPENDIX I – Investigative Functions Jurisdiction/Scope of Investigation

Investigation Functions	Jurisdiction/ Scope of Investigation
Investigation & Digital Forensic Services (IDFS)	Breach of Code of Conduct, laws and regulations in relation to fraudulent activities and corruptions by Company Personnel, vendors and other third parties that Company has an interest in.
Group Internal Audit (GIA)	Non-compliance to company policies, processes or internal controls that hinders company businesses operations
Security Department	Physical security breaches by Personnel, outsiders or third party contract staff
Industrial Relations (IR) under Group HR (GHR)	Covers all Personnel issues for the Group and its subsidiaries.
Marketing Customer Relation Dept. (CRD)	Complaints by customers against TC’s Sales & Services and Dealers
Environmental, Safety & Health (ESH), GHR	Environmental, Safety & Health issues or breaches.



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ADMINISTRATION

Document No.:	Document Title:	Version No.	Effective Date
TCMH/HQ/GC/POO1	TCMH Group’s Fraud Prevention Policy	0	23 January 2013
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Approval Date:	23 January 2013		
History of Revision			
Date	Version No.	Details of Changes	
23 January 2013	0	Initial Release	
24 May 2021	1	First Revision	