### FRAUD AND MALPRACTICE POLICY & PROCEDURES

**MIDAS UPSTREAM SERVICES LIMITED** is committed to promoting and ensuring a supply chain that is free of corruption and securing a work environment that is protected against fraud and malpractice.

Fraud and malpractice and their effects have grave consequences in the smooth and correct running of any company. Corruption as one of the worst practices modern economies are facing and fighting against; **MIDAS UPSTREAM SERVICES LIMITED** has instituted measures to control, fight and contain corruption as much as possible.

This policy is designed to protect **MIDAS UPSTREAM SERVICES LIMITED** operations, shareholders, clients and employees from the adverse effect of fraudulent behaviors.

The company requires all staff at all times to act with honesty, integrity, and to safe guard the resources for which they are responsible Fraud and theft is an ever present threat to these resources; hence must be a concern to all members of staff.

Fraudulent and dishonest behaviors can result in substantial cost for the company, loss to business and damage to our reputation.

This policy applies to all employees, directors, contractors including consultants and every other interested parties of **MIDAS UPSTREAM SERVICES LIMITED**.

## What is Fraud?

**MIDAS UPSTREAM SERVICES LIMITED** considers fraud as any deliberate action by a person(s), or allowing actions to be taken by another, for the purpose of, or intention of:

1. Obtaining money, assets or services
2. Distorting business performance
3. Causing loss to the company, client, suppliers or employees
4. Accepting high value gift or inappropriate hospitality
5. Prejudicing company’s competitive position or business reputation
6. Money laundering
7. Unauthorized release of confidential information
8. Employment of illegal emigrant, those working under an assumed name or anyone unauthorized to work or carry on business in Nigeria
9. Tax evasion
10. Conflict of interest

## The Organization should be Responsible for:-

* Developing and maintaining effective controls to prevent fraud
* Carrying out vigorous and prompt investigations if fraud occurs
* Taking appropriate legal and or disciplinary actions against perpetrators of frauds
* Taking disciplinary action against supervisors were supervisors failure shave contributed to the commission of fraud

**Directors Responsibilities:**

* Establishment, monitoring, maintenance and review of this policy
* Satisfying themselves that the **MIDAS UPSTREAM SERVICES LIMITED** business is conducted in accordance with national and international laws, contractual requirement, regulations and memorandum and article of association
* Keeping themselves informed about all aspect of the work of the organization
* Submitting annual accounts for independent examination
* Holding staff responsible through reports and questions

**What is Your Role?**

All persons covered by this policy have a role to play in preventing, detecting and reporting fraud.

You MUST:

* Work in such a way as to prevent fraud.
* Immediately report any suspicion of fraud to the Managing Director or any Senior manager

You Should NOT:

* Confront the suspect, or
* Discuss the suspicion more widely, or
* Begin any investigation that may result in loss of evidence

Employees have a statutory duty to report suspicion of money laundering or knowledge of unlawful funds immediately to the Managing Director.

## Key Procedure for the Prevention of Fraud, Malpractice, etc

* The competence and integrity of individual staff members and directors is our primary safeguard, and must be recognized and establish before and during employment.
* All cheques must be signed by authorized signatories to the Company’s account(s) after going through the approval process.
* All claims for payment must be checked and counter signed by the finance officer and General Manager, none of whom must have personal interest in the claim concerned
* All incomes must be paid in to the company’s bank account(s)
* Work instructions must be fully followed at all times to ensure accountability

**Following the Reporting of Suspected Fraud**:

All members of the organization must report any suspected case of fraud and every reported incident of fraud must be investigated and the confidence of those reporting the incident or suspicion of fraud will be respected.

The investigation will be carried out either internally by managers appointed by the Managing Director and having no operational responsibility within the business unit implicated or, externally, by an appointed agency reporting to the Managing director.

Following investigation, every fraud involving member of staff will be reported directly to the Managing Director.

Suspicion of money laundering will be reported to the Managing Director immediately, without investigation commencing, in order that appropriate external authorities can be notified if the case calls for that.

In all cases the Managing Director will take the decision as to whether the police or other government agencies should be brought in to the investigation. Malicious accusations maybe the subject of disciplinary action

## Consequences of Committing Fraud:

Any employee or director who has committed fraud should expect suitable disciplinary actions, which may include summery dismissal. Individuals will normally be prosecuted and the company will seek to recover from losses.

### Arrangement for Review of this Policy

* Any suspected case of fraud and malpractice must immediately be reported to management so that appropriate action can be taken. Such action may include amending this policy
* Management shall review this policy at least on every year to establish its implementation and effectiveness in the control of fraud and malpractice.

# Approved By:

**MANGING DIRECTOR**

**MIDAS UPSTREAM SERVICES LTD**