



FRAUD POLICY

Background

This Group Fraud Policy is created to facilitate the development of controls that will aid in the detection and prevention of fraud against Remington Group. It is the intent of Remington Group to promote consistent organizational behavior by providing guidelines and assigning responsibility for the development of controls and the conduct of investigations.

Scope of Policy

This policy relates to the Business Integrity Policy, and it applies to any irregularity, or suspected irregularity, involving employees, as well as shareholders, consultants, vendors, contractors, and/or any other parties with a business relationship with Remington Group through its business units trading as;

- Remington Technology Limited,
- BizPrint & Scan,
- FX Business Centre

Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position title, or relationship to the Company.

Policy

The management of Remington Group is responsible for the detection and prevention of fraud, misappropriations, and other irregularities.

Fraud occurs when a person deceives, tricks, or lies to profit unfairly or gain a dishonest advantage. It is the actions of a dishonest and untrustworthy person who sets out to con, trick, deceive or steal from Remington Group. Fraud does not only affect the individual committing the crime; the implications are far greater. Our families, communities and society suffer as a result of such a dishonest act.

Each member of the management team is expected to be familiar with the types of improprieties that might occur within his or her area of responsibility, and be alert for any indication of irregularity. Any irregularity that is detected or suspected must be reported immediately to the Chief Executive Officer of Remington Group, who oversees all investigations carried out by the Human Resources department and other affected areas, both internal and external.

Actions Constituting Fraud

The terms *defalcation*, *misappropriation*, and *other fiscal irregularities* refer to, but are not limited to:

- Any dishonest or fraudulent act,
- Misappropriation of funds, securities, supplies, or other assets,
- Impropriety in the handling or reporting of money or financial transactions,
- Profiteering as a result of insider knowledge of company activities,
- Disclosing confidential and proprietary information to outside parties,
- Disclosing to other people securities activities engaged in or contemplated by the company,
- Accepting or seeking anything of material value from contractors, vendors, or persons providing services or materials to the company,
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment,
- Any similar or related irregularity.

Other Irregularities

Irregularities concerning an employee's moral, ethical, or behavioral conduct should be resolved by departmental management and the Human Resources department.

If there is any question as to whether an action constitutes fraud, contact an Officer of the Human Resources department for guidance.

Investigation Responsibilities

The Human Resources department has the primary responsibility for the investigation of all suspected fraudulent acts as defined in this policy.

If the investigation substantiates that fraudulent activities have occurred, the Human Resources department will issue reports to the Chief Executive Officer who will make the decision to prosecute or refer the internal investigation reports to the appropriate law enforcement and/or regulatory agencies for independent investigation, for a final decision on disposition of the case.

Confidentiality

The Human Resources department treats all information received confidentially. Any employee who suspects dishonest or fraudulent activity will notify the Human Resources department immediately, and *should not attempt to personally conduct investigations or interviews/interrogations* related to any suspected fraudulent act (refer to the Reporting Procedures section of this policy).

Investigation results *will not be disclosed or discussed* with any other person than those who have a legitimate need to know. This is important in order to avoid damaging the reputation of a person suspected but subsequently found innocent of wrongful conduct and to protect the Company from potential civil liability.

Authorization for Investigating Suspected Fraud

The Human Resources department, assisted by Internal Audit and the CFO will carry out internal investigations and where required, work with external law enforces/agency to have:

- Free and unrestricted access to all Company records and premises, whether owned or rented,
- The authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who might use or have custody of any such items or facilities when it is within the scope of their investigation.

Reporting Procedures

Great care must be taken in the investigation of suspected improprieties or irregularities so as to avoid mistaken accusations or alerting suspected individuals that an investigation is under way.

An employee who discovers or suspects fraudulent activity **MUST** *contact the Human Resources department, or their line manager immediately*. The employee or other complainant may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual, his Lawyer or representative, or any other inquirer should be directed to the Human Resources department. No information concerning the status of an investigation will be given out. The proper response to any inquiries is: "I am not at liberty to discuss this matter." *Under no circumstances* should any reference be made to "the allegation," "the crime," "the fraud," "the forgery," "the misappropriation," or any other specific reference.

The reporting individual should be informed of the following:

- Do not contact the suspected individual in an effort to determine facts or demand restitution.
- Do not discuss the case, facts, suspicions, or allegations with *anyone* unless specifically asked to do so by the Human Resources department.

Acting in Good Faith

Anyone reporting any irregularity that is detected or suspected must be acting in good faith and have reasonable grounds for believing the information provided. Allegations made maliciously or with knowledge of their falsity will not be tolerated. People making such allegations may be subject to disciplinary action and/or legal actions by the individuals accused of fraudulent conduct.

Whistleblower Protection

In the rare event that a whistleblower's identity is suspected or known, employees of Remington Group must not retaliate against a whistleblower for reporting an activity which that person believes to be fraudulent or dishonest with the intent or effect of adversely affecting the terms or conditions of employment (including, but not limited to, threats of physical harm, dismissal, demotion, suspension, or impact on salary or wages).

A whistleblower is defined as an employee who informs a manager, supervisor, or the Chief Executive Officer of Remington Group about an activity which that person believes to be fraudulent or dishonest.

Whistleblowers who believe that they have been retaliated against may file a written complaint with the Group Manager, Human Resources.

Any complaint of retaliation will be promptly investigated by the Human Resources department and appropriate corrective actions will be taken if allegations of retaliation are proven. This protection from retaliation is not intended to prohibit managers or supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

Termination

If an investigation results in a recommendation to terminate an individual, the recommendation will be reviewed for approval by the Chief Executive Officer before any such action is taken. The Human Resources department does not have the authority to terminate an employee without the knowledge and approval of the Chief Executive Officer.

Administration

The Group Manager, Human Resources is responsible for the administration, revision, interpretation, and application of this policy. The policy will be reviewed and revised as needed.

I acknowledge that I have read and understand the above.

| | |
|-----------|--|
| Name | |
| Signature | |
| Date | |

**** Please read, sign and date, and return.**