



Fraud Prevention Policy

At BASSEL®, integrity and financial discipline are fundamental to our governance framework and global commodity operations.

We maintain a strict zero-tolerance approach toward fraud, misrepresentation, asset misappropriation, financial manipulation, cyber fraud, and any form of dishonest or unlawful conduct.

This policy establishes BASSEL®'s structured framework for preventing, detecting, reporting, and responding to fraud risks across all jurisdictions in which we operate.

Commitment to Integrity

BASSEL® is committed to:

1 Conducting business with transparency and ethical discipline

Protecting corporate assets, financial systems, and stakeholders

Preventing fraudulent conduct within operations and business relationships

Maintaining accurate, truthful, and complete records

Fraud in any form is strictly prohibited.

Scope of Application

This policy applies to:

All directors, officers, employees, consultants, and representatives

Agents, intermediaries, contractors, and business partners

All commercial transactions, financial arrangements, and operational activities

Definition of Fraud

Fraud includes any intentional act or omission designed to obtain unlawful or unfair advantage or to cause loss through deception.

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This may include, but is not limited to:

Falsification of documents or financial records

Misappropriation of funds or assets

Bribery, corruption, or improper inducements

Conflict of interest abuses

Unauthorized disclosure or misuse of confidential information

Cyber fraud or digital manipulation

Prevention & Internal Controls

BASSEL® maintains preventive controls designed to reduce fraud risk, including:

Segregation of duties and authorization protocols

Risk-based due diligence (KYC / KYB / counterparty screening)

Structured financial controls and approval mechanisms

Secure information systems and data protection measures

Ongoing compliance oversight

Enhanced review may be applied in high-risk transactions or jurisdictions.

Reporting & Escalation

All individuals acting on behalf of BASSEL® must report suspected or actual fraudulent activity through established reporting channels.

Reports are handled confidentially and without retaliation in accordance with BASSEL®'s governance framework.

Investigation & Enforcement

Suspected fraud cases are reviewed objectively and may be investigated internally or with external expertise where appropriate.

Violations may result in:

Disciplinary action



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Termination of employment or contractual relationships

Financial recovery measures

Referral to regulatory or law enforcement authorities

Governance & Oversight

This policy operates under the supervision of BASSEL®'s Independent Compliance Function, ensuring impartial oversight separate from commercial operations.

Fraud prevention forms an integral part of BASSEL®'s broader compliance and risk management architecture.

Why Fraud Prevention Is Addressed Separately

Fraud risk management constitutes a distinct and critical component of BASSEL®'s governance architecture.

Given the complexity of global commodity trade, cross-border transactions, and structured financial arrangements, BASSEL® maintains a dedicated Fraud Prevention Policy to reinforce financial discipline, asset protection, and transactional integrity.

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This policy complements — but operates independently from — our Anti-Corruption, AML/CFT, and Sanctions frameworks, ensuring that operational, financial, and digital fraud risks are proactively identified and mitigated.

By structuring fraud prevention as a standalone governance pillar, BASSEL® reinforces its commitment to transparency, accountability, and institutional resilience across all jurisdictions.

Continuous Oversight

Compliance with this policy is mandatory.

BASSEL® reserves the right to review, investigate, and take appropriate corrective action in response to any suspected fraud risk or policy breach.

Reviewed and formally approved by the Independent Compliance Unit of BASSEL®

APPROVED

COMPLIANCE

