

## ANTI-FRAUD PREVENTION POLICY

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### Objective

The objective of Anti-fraud policy is to implement monetary and risk controls that will aid in the detection and prevention of fraud against ITC Translations. It is the intent of ITC Translations to promote consistent organizational behavior and to uphold highest standards of moral and ethics while conducting business.

The term **employee** is used in this Code to refer to all workers at ITC Translations: salaried employees, staff in training, temporary staff and interns. The term **Company** refers to ITC France, located at CITYWORK LE 360 – 1 Route du Perollier 69570 DARDILLY – FRANCE, company registration number (France): 490 046 935; ITC Canada, located at 880 Rue Roy E, Suite 200 – Montréal, QC H2L 1E6 – CANADA; ITC USA located at 2000 PGA Blvd., Suite 4440 Palm Beach Gardens, FL 33408 – USA.

### Scope and Applicability

This policy applies to all employees as well as shareholders, consultants, vendors, contractors, outside agencies doing business with employees of such agencies, and/or any other parties with a business relationship with ITC Translations.

Anti-fraud policy is applicable to any and all act(s) or omission(s) that constitutes fraudulent or suspected fraudulent activity that includes, but not limited to, monetary items such as cash, funds, stock, proprietary information, intellectual properties, material of value, content, data, assets, properties, consumables, office articles and supplies including stationery, deals, contracts, bribes, gifts, favours, influencing, undue prioritisation, etc., for personal gains either individually or collectively by its employees or associates of the Company.

### Policy / Process

- 1) Policy

Management is responsible for the detection and prevention of fraud, misappropriations, and other irregularities. Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of self gain, profiteering or inducing another to perform fraudulent acts alone or in partnership. It is a breach of trust and gross violation of the Code of Ethics.

Any irregularity that is detected or suspected must be reported immediately to the HR Manager of ITC Translations, who coordinates all investigations with the Legal Department for taking appropriate action.

## 2) Actions Constituting Fraud

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

- Any dishonest or fraudulent act, including forgery, falsification of documents and instruments, misrepresentation, impersonation and other activities.
- Misappropriation of funds, securities, supplies or other assets
- Impropriety in 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 persons securities activities engaged in or contemplated by the company
- Accepting or seeking anything of material value from contractors, vendors or persons providing services / materials to the Company.
- Destruction, removal or inappropriate use of records, furniture, fixtures and equipment and/or
- Any similar or related irregularity

## 3) Investigation Responsibilities

The HR Department has the primary responsibility for the investigation of all suspected fraudulent acts as defined in the policy. If the investigation substantiates that fraudulent activities have occurred, the HR Department will issue reports to appropriate designated personnel and, if appropriate, to the Founder/President.

Decisions to prosecute or refer the investigation results to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made in conjunction with legal counsel and senior management, as will final decisions on disposition of the case.

## 4) Confidentiality

The HR Department treats all information received confidentially. Any employee who suspects dishonest or fraudulent activity will notify the HR Department immediately and should not attempt to personally conduct investigations or interview / interrogation related to any suspected fraudulent act. Investigation results will not be disclosed or discussed with anyone other than those who have a

legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect the Company.

#### 5) Authorization for Investigating Suspected Fraud

Members of the Investigation team will have:

- Free and unrestricted access to all Company records and premises, whether owned or rented; and
- 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.
- Employees under investigation may be asked not to enter Company premises or to access any Company web pages, drives or links either personally or through colleagues or other means, until the investigations are complete.
- Company reserves the right to question the employee's colleagues, friends, relatives, associates, outside service providers, etc., whom the Company or its investigating team suspects of their involvement.

#### 6) 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 underway. An employee who discovers or suspects fraudulent activity will contact the HR Department immediately. The employee or other complainant may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual, his or her attorney or representative or any other inquirer should be directed to the Investigations team or the Legal Department. No information concerning the status of an investigation will be given out.

The individual who reports a fraud should be made aware 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 Legal Department or HR Department.

#### 7) Termination

If an investigation results in a recommendation to terminate an individual, the recommendation from the Investigating team will be reviewed for approval by Human Resources and the Legal Department and, if necessary, by outside counsel, before any such action is taken. The decision to terminate an employee is made by the Management.

### Special Circumstance and Exception

Any Deviation to this policy has to be approved by Management.

### Non-compliance and Consequence

Violation of this policy is subject to disciplinary action, up to and including termination.

## REVISIONS AND VALIDATION

### Document Revisions

No.	Document Version	Revision Description	Revision Date	Reviser
1	V1	Creation of ITC Anti-Fraud Policy	05/23/2022	M.Lavarenne
2	V2	Periodic Update	09/01/2022	M.Lavarenne
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### Document Validation

This document and its version number have been logged in the ITC Document Tracking file. It has been signed off and validated by the ITC HR Manager.

Date: 09/01/2022

Name: M. Lavarenne

Signature: 