Servitium Micro Finance Private Limited
(formerly Sunflag Merchants Private Limited)

FRAUD MANAGEMENT POLICY

Board Meeting Date	Subject	Department	Approved by
23/06/2025	Fraud Management Policy	Compliance–as Custodian Operation for implementation	Board of Directors

SERVITIUM MICRO FINANCE PRIVATE LIMITED

Fraud Management Policy

BACKGROUND

The Fraud Prevention policy has been framed to establish a system for prevention, detection, investigation and reporting of fraud, against Servitium Micro Finance Private Limited (herein after referred to as "Servitium" or "the Company") keeping in view the following objectives:

- To establish procedures and controls that will aid in the detection and prevention of fraud
- To provide guidance to Servitium employees in fraud prevention, identification and detection
- To develop internal controls and to investigate frauds
- To promptly record frauds and report frauds, as required, to RBI and other agencies
- To provide necessary training to Servitium staff

SCOPE OF POLICY

This policy applies to any fraud, or suspected fraud, involving employees as well as outside agencies and Persons having Business Relationship with Servitium Micro Finance Private Limited.

OBJECTIVE OF POLICY

The Policy has been established to outline the requirements for the development of controls that will assist in the detection, prevention and management of Fraud.

This Policy must be applied to any Fraud, or suspected Fraud, involving any member of the Boards of Directors, the Chief Executive Officers, the Management teams or staff of

Servitium, as well as minority shareholders and all others who conduct business with Servitium, such as customers, third party agents and representatives, including consultants, contractors, suppliers, vendors, subcontractors and agents.

The Policy is designed to fulfil the following objectives:

- Maintain the highest standard of ethics, professional conduct and fiduciary duty & responsibility;
- Protect Servitium's funds and other assets;
- Secure Servitium's businesses;
- Protect the reputation of Servitium and its employees; and

THE POLICY

This document outlines Servitium's policy concerning fraud and provides guidelines for the implementation and enforcement of Servitium Fraud Prevention Policy referred to herein after as the 'Policy'. This policy and any future amendments are subject to the Board of Directors' approval.

The company shall follow the policy at all levels. Each member of the management team will 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.

The Internal Audit Department of the company shall be responsible for the detection of frauds during the course of its Internal Audits and reporting thereof and to recommend necessary internal controls for fraud prevention. The frauds being detected during the course of audit by the internal auditors shall be covered in the scope of Executive Summary report of the Internal Audit Department and shall be placed before the Audit Committee of the Board for further direction.

Any irregularity that is detected or suspected by any staff member or the management team must be reported immediately to the Head of Internal Audit Department, who shall in turn investigate the matter in detail and decide the future course of action including reporting thereof and the imposition of penalties on the involved staff members or change in the system and controls, in consultation with the Managing Director, Operations Head

or other departmental heads, as may be required. Information concerning the status of an investigation will be kept confidential. The complainant or the staff who detects the fraud in the course of his office duties shall be instructed:

- Not to contact the suspected individual directly, so as to determine facts.
- Not to discuss the case, facts, suspicions, or allegations with any other person

The company already has a Board approved 'Whistle Blower' policy.

Servitium Micro Finance Private Limited shall abide by regulatory guidelines and fraud reporting requirements, prescribed by the Regulatory Authorities.

ACTIONS CONSTITUTING FRAUD

A Fraud is a willful act intentionally committed by an individual by deception, suppression, cheating or any other fraudulent or any other illegal means, thereby, causing wrongful gain to oneself or to any other individual and wrongful loss to others. Some examples of fraudulent activity are:

- Misappropriation of funds, or other assets
- Impropriety in the handling or reporting of money or financial transactions
- Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to the Company.
- Misappropriation and criminal breach of trust
- Fraudulent encashment through forged instruments, manipulation of books of account or through fictitious accounts and conversion of property
- Unauthorised credit facilities extended for reward or for illegal gratification.
- Negligence and cash shortages
- Cheating and forgery
- Irregularities in foreign exchange transactions
- Any other type of fraud not coming under the specific heads as above.
- Cases of 'negligence and cash shortages' and 'irregularities in foreign exchange transactions' are to be reported as fraud if the intention to cheat / defraud is suspected / proved.
- In the following cases where fraudulent intention is not suspected / proved, at the time of detection, the matter will be treated as fraud and reported accordingly: (a)

Cases of cash shortages more than ₹10,000/- and (b) Cases of cash shortages more than ₹ 5000/- if detected by management /auditor / inspecting officer and not reported on the occurrence by the persons handling cash.

DETECTION AND INVESTIGATION OF FRAUD

The Head (Internal Audit) has the primary responsibility for the detection / investigation of all actual / suspected fraudulent acts as defined in the policy. However, the responsibility of reporting of any fraud shall not be limited to the Head of the Internal Audit Department, and any person/employee of the company who comes across any fraudulent activity shall promptly report the activity to the Internal Audit Department, to avoid occurrence of any fraud.

The person detecting the fraud or the investigating team must ensure proper procedures so as to avoid mistaken accusations or alerting suspected individuals that an investigation is under way. An employee who discovers or suspects fraudulent activity will inform the Audit Head immediately.

The reporting individual will be advised:

- Not to contact the suspected individual directly, in an effort to determine facts.
- Not to discuss the case, facts, suspicions, or allegations with any other person

(a) FRAUD INVESTIGATION PROCEDURE

The Internal Audit Head shall, on the receipt of any complaint pertaining to fraud assess the facts reported (preliminary review) in order to understand the possible level (internal/external, level of the internal staff involvement, etc.) and the extent of any potential breach, as well as the severity of the case reported. He shall, on the basis of the primary enquiry decide the further course of action to be carried out and shall commence the investigation in consultation with the Managing Director and other related departments. During the course of Investigation the following procedure shall be adopted:

- Obtain copy of concern /complaint or reported breach;
- Identify, secure and gather data in whatever form, including the changing of locks and system access (where necessary and/or applicable);
- Obtain and analyse documents;

- Conduct initial validation of the information received to understand whether or not the claims are valid
- Perform data analytics on structured/unstructured data;
- Interview relevant internal and external individuals, document the interview and obtain their acknowledgement on the facts;
- Secure documents and relevant evidence related to the suspected Fraud, such as contents of the suspect's office or workstation, personal computer, diary and files including all personal documents, where possible/applicable;
- Securing / preserving the various related documents such as documents pertaining to testing procedures, financial data records, records of interviews and testimonies, consultation memo, related emails or other correspondences etc.
- Securing evidence – documents/evidence must be protected so that nothing is destroyed and so that they are admissible in legal proceedings.

(b) REPORTING, RECORDING AND MONITORING OF FRAUDULENT ACTS

The frauds being detected and investigated by the internal auditors shall be covered in the scope of Executive Summary report of the Internal Audit Department and shall be placed before the Audit Committee of the Board. The recording of the fraud cases shall be made by the compliance team in the fraud register on the basis of report of internal auditor. The Internal Audit Department of the company shall, in its internal audit report, also comment upon the status of any update on recovery etc. on any fraud.

Decisions to prosecute or refer the examination 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.

(c) PENALTIES ON STAFF INVOLVED IN FRAUD

If after investigation, it is found that the staff member was involved in the fraud, strict action shall be taken against the culprits. The amount involved in fraud, as per the report of the Internal Audit Department, shall be recovered from the staff directly involved in fraud. Fines in form of pay deduction or deference of promotions, transfer shall be imposed on all the employees who were reporting to the culprit or were his immediate

supervisors, who are proven to be delinquent in performance of their duties. The HR Department may recommend the transfer of staff or their termination from the employment of the company, depending upon the facts and circumstances of the case. Before taking the aforesaid action, the HR Department shall take the approval of the Managing Director. The power to recommend for termination of any employee on the basis of an enquiry/investigation of the Internal Audit Department, shall solely vest with the HR Department.

CONFIDENTIALITY

The Head (Internal Audit) will treat all information received with full confidentiality. Any employee who suspects dishonest or fraudulent activity will notify the Head (Internal Audit) immediately, and should not attempt to personally conduct investigations or interviews/interrogations related to any suspected fraudulent act.

Investigation results will not be disclosed or discussed with anyone other than those who need to be kept informed. This is important in order to avoid damaging the reputation of persons suspected but subsequently found innocent of wrongful conduct and to protect the Company from potential civil liability.

FRAUD PREVENTION

Through this policy the company shall strive to adopt a preventive approach for identifying, analysing and managing the risk of Fraud. The company shall follow zero tolerance to Fraud, at all levels. The company shall take steps to prevent the occurrence of fraud by :

- Performing background checks, and verifying documents pertaining to borrowers, employees and others with whom Servitium has a business relationship
- Conducting regular meetings with the staff members
- Conducting surprise visits at branches to check the records and documents.
- Conducting exit interviews for all employees
- Conducting Training Programmes and Seminars on frauds for all employees on a regular basis.

Staff Risk Matrix – Annexure 1

ADMINISTRATION

The Managing Director of Servitium Micro Finance Private Limited will oversee the administration, interpretation, and application of this policy. Any revision of this policy shall be placed before the Board of Directors for approval.

Annex-1

LP	The main of risks	Effect	Level of Risk	Risk response strategy
Designing risk				
1	Lack of acceptance by Investor of design proposals	Increase in costs due to the suspension of work of the design team	Low	Market observation, alternative designing solutions
2	Delays and difficulties in obtaining opinions and permits	Disturbed designing process	Medium	Earlier diagnosis of the situation in local authorities' offices, organization of meetings preceding designing process
3	Conflict among designing team members	Disturbed designing process	Low	Response of a team leader to all form of conflicts - mediation in a team
4	Too optimistic assessment of employee workload	Delay of designing work	Low	Proposing for employees to work overtime or ordering of part of work to another designing team
5	Incorrect information from investor/lack of clear guidelines	Verification of errors will increase costs and increase time due to the development of the next revision of design.	High	Application to investor for extension of time to complete a design due to additional circumstances
6	Staff do not have sufficient knowledge about the subject of design	Verification of errors will increase time due to the repeated checks of designing work	Medium	Designing team leader strengthens control over work, providing for employees consultation with an expert
Time risk				
7	Acceptance of unrealistic deadlines in contract	Deterioration of design quality of failure to meet the deadline	High	Employment of new employees or ordering part of work to another party during a contract
Budget risk				
8	Underestimation of design budget	Deterioration of design quality	High	Limiting scope of design to necessary minimum