# Anti Fraud Policy

C1 Network FZ-LLC
DMC, Building 05,
Dubai Media City,
P.O. Box 393243 Dubai
United Arab Emirates

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## Purpose and scope of this policy

C1 has a commitment to high legal and ethical standards and all Affiliates are required to share this commitment. The purpose of this policy is to clarify the responsibilities of all Affiliates with respect to fraud and fraud prevention and the actions that will be taken by C1 towards any Affiliate if fraud is suspected and/or detected vis-à-vis C1 and/or C1´s partners.  C1

**Definition of fraud**

The legal definition of fraud varies among countries and jurisdictions, but the term is commonly used to describe a wide variety of dishonest practices and misconduct. Fraud comprises both the use of deception to obtain an unjust or illegal financial advantage and intentional misrepresentations affecting the financial statements by one or more individuals. Fraud is commonly perpetrated by parties to obtain money, property, or services; to avoid payment or loss of services, or to secure personal or business advantage. Acts of fraud are not dependent upon the application or threat of violence or of physical force.

**Acts of fraud may involve, but are not limited to:**

- Fraudulent use of credit cards;
- Fictitious bookings, orders or purchases of any kind;
- Making of false statements to obtain a financial or other benefit for oneself or another/others;
- Using another person’s IT identity or password, or creating false identities/passwords, without consent or authority.
- Manipulating the Compensation Plan or commission structures to obtain unauthorised financial or other benefits;
- Creating or using fictitious Affiliate accounts for fraudulent purposes;
- Submitting false or fake documents for the KYC process; and
- Submitting false or misleading claims for Commissions, Bonuses or Rewards.

It should be noted that actions taken to instigate, aid, abet, attempt, conspire or cooperate in a fraudulent act, also constitute fraud.

**Investigation of allegations**

All allegations of fraud and suspected fraud are taken seriously. Upon receipt of information indicating fraud or suspected fraud, C1 will assess the information and may suspend the Affiliate pending further investigation. Where C1 determines, following an appropriate assessment or investigation, that fraud has occurred, C1 may terminate the Affiliate's membership in accordance with the applicable terms and conditions.

Should the Affiliate be suspended all e-wallet balances, Commissions, Bonuses and Reward funds will be subject to suspension and the Affiliate in question may be blocked from accessing the C1 website.

Where an Affiliate's membership is terminated due to fraud, C1 may withhold, cancel or recover commissions, bonuses and rewards arising from or connected with the fraudulent activity, subject to the applicable terms and

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conditions and applicable law. Any other outstanding entitlements shall be dealt with in accordance with the applicable terms and conditions.

All Affiliates are required to cooperate with reasonable investigations into suspected fraud, including providing relevant information and documentation upon request. Failure to cooperate may result in appropriate action in accordance with the applicable terms and conditions.

**Disciplinary/legal action**

C1 may report suspected or confirmed fraud to the appropriate regulatory, law enforcement or other competent authorities where required by applicable law or where C1 considers such reporting appropriate.

C1 reserves the right to take legal action against any Affiliate whom C1 suspects of having committed fraud.

**Reporting fraud**

Anyone with information regarding fraud or suspected fraud is strongly encouraged to report this information to C1's Compliance Department at compliance@C1.com.

All reports of suspected fraud must be made in good faith. Knowingly submitting false or misleading allegations may result in appropriate disciplinary or legal action.

**Confidentiality and protection against retaliation**

C1 will treat reports of suspected fraud confidentially, to the extent reasonably practicable and permitted by applicable law. C1 prohibits retaliation against any individual who reports suspected fraud in good faith or assists with an investigation.

**Anonymous reports**

Individuals wishing to protect their identity may report fraud anonymously using a non-registered email address. For anonymous reports, a report number and code are used to allow the individual making a complaint to follow up and to check if the assessing officer has requested further information.

*This Anti Fraud Policy will be translated into different languages. In case of any discrepancies between this English version and the translated versions, the English version of the Anti Fraud Policy shall prevail.*