



**ETHICS VIOLATION POLICY/FRAUD AND CORRUPTION REPORTING POLICY
KM ADVOCATES AND ASSOCIATES**

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Introduction.

KM Advocates and Associates is committed to maintaining the highest ethical standards and preventing ethics violations, including corruption, bribery, and fraud in the organization.

Scope of the policy

This policy applies to all employees, contractors, and third-party vendors.

Ethics Violations includes the following acts but not limited to;

- ❖ Corruption
- ❖ Bribery
- ❖ Fraud
- ❖ Conflict of interest
- ❖ Unauthorized disclosure of confidential information
- ❖ Retaliation against whistleblowers

Reporting Ethics Violations

- a. Employees must report suspected ethics violations to their supervisor, HR, or the Compliance Officer.
- b. Reports can be made anonymously through the whistleblower box or email.
- c. Reports will be investigated promptly and discreetly.

Investigation Procedure for ethical violations

1. **Initial Review:** Compliance Officer will review the report and determine if an investigation is necessary.
2. **Investigation:** A thorough investigation will be conducted, including interviews and evidence collection.
3. **Findings:** The investigation findings will be documented and presented to management.

4. **Disciplinary Action:** Appropriate disciplinary action will be taken against individuals found to have committed ethics violations.

5. **Reporting:** Reports of ethics violations and investigation findings will be reported to the Audit Committee and senior management.

Confidentiality and Retaliation Protection.

- i. Reports and investigations will be kept confidential to the extent possible.
- ii. Retaliation against whistleblowers is prohibited and will result in disciplinary action.

Training and Awareness for ethics includes the following

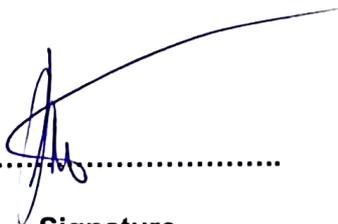
- A. Employees will receive training on ethics and compliance quarterly to enhance discipline of the staff
- B. Awareness programs will be implemented to promote ethical behavior at the workplace.

Monitoring and Review

This policy will be reviewed and updated annually, or as needed.

By implementing this policy, KM Advocates and Associates demonstrate its commitment to ethical business practices and compliance with legal and regulatory requirements.

Approved by Managing Partner,


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Signature