	KSHEMA POWER INDIA PRIVATE LIMITED	Doc. No.	IMS/P/012
		Rev. No.	03
		Rev. Date	12.12.2025
		Issue No.	03
		Issue Date	15.12.2025
INTEGRATED MANAGEMENT SYSTEM- FRAUD PREVENTION AND MITIGATION POLICY ISO 9001:2015, ISO 14001:2015 & ISO 45001: 2018			

1. Purpose

This policy establishes guidelines to prevent, detect, and address fraud in EPC projects. It aims to ensure transparency, accountability, and integrity in all project phases, including engineering, procurement, and construction activities.

2. Scope

This policy applies to all employees, contractors, subcontractors, suppliers, consultants, and any other stakeholders involved in EPC projects.

3. Definition of Fraud

Fraud includes, but is not limited to:

- **Financial Misconduct:** Embezzlement, misappropriation of funds, false invoicing, and unauthorized expenses.
- **Procurement Fraud:** Bid rigging, collusion, kickbacks, and favoritism in supplier selection.
- **Corruption & Bribery:** Offering or accepting bribes, gifts, or favors that influence decision-making.
- **Material & Asset Misuse:** Theft, falsification of inventory, and misuse of project resources.
- **Misrepresentation:** False reporting, misrepresentation of project progress, and alteration of documents.

4. Prevention Measures

4.1 Governance & Compliance

- Establish a fraud risk management framework.
- Enforce strict compliance with local and international anti-fraud laws.
- Conduct due diligence on all vendors and third parties.

4.2 Financial & Procurement Controls

- Implement a dual-approval system for transactions and contracts.
- Maintain detailed records of all financial transactions.
- Conduct regular procurement audits and background checks on vendors.

4.3 Employee Training & Awareness

- Provide mandatory fraud awareness training.
- Establish an anonymous reporting mechanism (whistleblower policy).
- Encourage a culture of ethical responsibility and integrity.

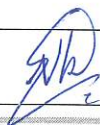
5. Detection Measures

- Regular internal and external audits.
- Real-time monitoring of financial and operational activities.
- Implementation of digital tracking systems for procurement and payments.
- Surprise inspections and forensic accounting reviews.

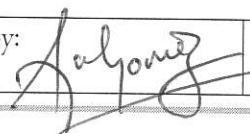
Prepared by:



Verified by:



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Page I of 2

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6. Reporting & Investigation

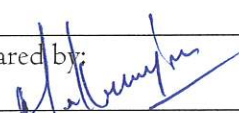
- All fraud-related concerns must be reported to the Fraud Investigation Committee (FIC).
- Investigations will be conducted promptly and confidentially.
- Employees who report fraud in good faith will be protected under the whistleblower policy.


7. Consequences & Corrective Actions

- Disciplinary action, including termination of employment or contracts.
- Legal action against individuals or entities involved in fraud.
- Recovery of misused funds and assets.
- Implementation of corrective measures to prevent recurrence.

8. Review & Updates

This policy will be reviewed annually to ensure its effectiveness and compliance with legal and regulatory changes.

Prepared by: 

Verified by: 

Approved by: 