
ANTI-FRAUD POLICY

1. Mission Statement

We operate ethically, at all times, in every situation. We are committed to protecting Boroo, its assets, information and reputation from fraud in all its forms and complying with applicable antifraud laws and regulations in all jurisdictions where we do business.

We demand the same from all of our employees, contractors, officers, directors, as well as third party vendors, and all others who do business on our behalf or with whom we do business.

2. Our Approach

In fulfilling this mission, we are guided by several principles that define our approach:

- Our business dealings should be transparent, ethical, and lawful no matter who our counterparts are – co-workers, commercial partners, government officials, community members, or others.
- We seek to avoid and prevent potentially fraudulent behaviour.
- We avoid situations where we make (or could be perceived to make) business decisions based on personal gain – and where a conflict exists, we act in Boroo's best interest.
- We encourage allegations or suspicions to be reported, we take those reports seriously, and we do not tolerate retaliation in any form.
- We make changes where appropriate to prevent or remediate fraudulent activity when we identify it.
- We strive to create and maintain accurate records, regardless of type, and correctly document all transactions.
- We monitor and try to continuously improve our performance.

3. Steps We Take

To try to meet these commitments, we aim to take several steps:

- Develop and implement supporting procedures, training and internal reporting structures to embed this Policy throughout our company. Provide training on our anti-fraud and conflict of interest requirements to employees.
- Create financial processes and controls designed to prevent and detect fraud and other improper activities.
- Establish and maintain methods for employees, third parties and other stakeholders to report concerns regarding fraud, conflicts, and corruption, including anonymously through a hotline, and undertake inquiries when concerns are raised.
- Conduct assessments, testing, and audits to give us confidence that we are complying with this Policy. We may conduct those activities ourselves, or use external third parties, and will include performance improvement action plans.
- Respond appropriately, where we identify violations of this Policy.

- Communicate this Policy to our employees, contractors, officers, directors, and third party vendors and make it available to the public.

4. Definition

Fraud is any intentional, reckless or negligent act that someone performs in order to improperly or unfairly obtain a benefit. This includes corruption, misappropriation, misrepresentation, theft, and other similar schemes.

Specifically, such acts could include, but are not limited to:

- Misrepresentation in Boroo 's publicly released financial statements or other public disclosures.
- Misappropriation or theft of Boroo 's assets, such as gold, money, equipment, or supplies.
- Unlawfully obtaining revenue or assets, or unlawfully avoiding costs or expenses.
- Commercial bribery, bribery of a government official, or other violations of anti-corruption laws or Boroo 's Anti-Bribery and Anti-Corruption Policy.
- Improper payment schemes, including seeking or accepting kickbacks or gifts from suppliers or other business partners that are intended to, or may appear to, influence business judgment.

5. Reporting

If any Third Party is aware of any activity by any Worker which might lead to, or suggest, a breach of this policy, they should raise their concerns with the Group's Legal Counsel, Sarantsatsral Gombosuren, at sarah@boroomc.com.sg.

6. Fraud Matter Management

Reports of potential violations of this Policy are taken seriously. After a report is submitted:

- It is reviewed by Compliance and/or Legal personnel together with management to assess severity and investigative steps. Relevant functions may also assist with the process.
- It is investigated by Compliance and/or Legal personnel with support from the relevant function and management. In rare cases, external resources may be used to conduct the investigation, including review of records and witness interviews as appropriate.
- Investigative findings are assessed and disciplinary actions, after consultation with senior management as applicable, may be implemented.
- Allegations and investigative findings/outcomes are reported to Boroo 's Board of Directors on a quarterly basis and to company leadership.

Anonymity and confidentiality are respected throughout the investigative process. Boroo does not tolerate retaliation against any person for submitting a timely report in good faith. The reporting and investigative processes are regularly assessed and evaluated for opportunities for improvement.

7. Conflict of Interest

We avoid conflicts of interest where there might be a question whether we are acting for Boroo 's benefit or for our personal gain. These conflicts can arise when we have private interests that may make it difficult to make decisions or perform our work objectively and effectively.

Such conflicts could relate to financial, business, charitable or social activities such as serving as a director or officer of a competitor or business partner, investing in a supplier or trading in shares of a competitor, or owning an interest in a potential business partner.

Potential or perceived conflicts of interest should be reported to Compliance or Legal personnel, the or management.

8. Government-Related Obligations

Refer to Boroo 's Anti-Bribery and Anti-Corruption Policy for details on the required protocols and approvals relating to interactions with or support for a government official or agency. This includes security-related support, travel, accommodations, meals, entertainment, per diems, other direct monetary or in-kind support, charitable or cultural donations, political contributions or support, or support agreements with government or government-affiliated third parties.

9. Policy Scope

The Policy is applicable to all of our employees, contractors, officers, directors, as well as third party vendors, and all others who do business on our behalf or with whom we do business at every site that we operate. It is intended to supplement all applicable laws, rules, and other corporate policies, including the Code.