



**Creative Services Limited (CSL)**  
**Anti-Fraud, Anti-Bribery, and Anti-Corruption Policy**  
(Version-1, Effective from January 01, 2024)

## 1. Introduction

Creative Services Limited (CSL) is committed to maintaining the highest standards of integrity and ethical conduct in all its business activities. The Anti-Fraud, Anti-Bribery, and Anti-Corruption Policy outline their commitment to detect, prevent, and address fraud and corruption within the organization. The policy aims to create a transparent, accountable, and corruption-free environment for employees and stakeholders.

## 2. Scope

This policy applies to all employees, contractors, volunteers, clients, suppliers, and stakeholders of CSL. It covers all aspects of CSL's operations, including interactions with external parties, to ensure that all activities are conducted ethically and in compliance with the law.

## 3. Definitions

**Fraud:** Any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain.

**Bribery:** Offering, giving, receiving, or soliciting something of value as a means to influence the actions of an individual in a position of trust.

**Corruption:** Abuse of entrusted power for private gain, which can occur in both public and private sectors.

## 4. Principles

CSL is committed to:

- Integrity: Conducting business in an honest and ethical manner.
- Transparency: Ensuring transparency in all our dealings and decision-making processes.
- Accountability: Holding all employees and stakeholders accountable for their actions.
- Compliance: Adhering to all relevant laws, regulations, and international standards related to fraud, bribery, and corruption.

## 5. Policy Statements

**5.1 Zero Tolerance:** CSL has a zero-tolerance approach to fraud, bribery, and corruption. Any involvement in such activities will result in immediate disciplinary action, including termination of employment or contracts, and may lead to legal action.

**5.2 Prevention:** We will implement effective measures to prevent fraud, bribery, and corruption, including risk assessments, internal controls, and regular audits.

**5.3 Detection and Reporting:** Employees and stakeholders are encouraged to report any suspected instances of fraud, bribery, or corruption. All reports will be taken seriously and investigated promptly.

## **6. Responsibilities**

### **6.1 Management**

- Ensure the implementation and enforcement of this policy.
- Promote a culture of integrity and ethical behavior.
- Provide training and resources to prevent fraud, bribery, and corruption.

### **6.2 Employees**

- Adhere to this policy and all relevant laws and regulations.
- Report any suspected instances of fraud, bribery, or corruption.
- Participate in training and awareness programs.

### **6.3 Internal Audit and Compliance Team**

- Conduct regular risk assessments and audits to detect and prevent fraud, bribery, and corruption.
- Investigate reports of suspicious activities.
- Maintain and update the internal controls and procedures.

## **7. Reporting Procedure**

**7.1 How to Report:** Concerns can be reported through the following channels:

- Email: Send a detailed report to [cslbd71@gmail.com](mailto:cslbd71@gmail.com).
- Phone: Call the Compliance Hotline at +88-01718-966013.
- In Person: Report directly to the Compliance Officer or any member of senior management.

**7.2 Information to Provide:** When making a report, please provide as much detail as possible, including:

- Description of the suspected activity
- Names of individuals involved (if known)
- Relevant dates and times
- Any evidence or supporting information
- Contact details for follow-up (optional, if anonymity is desired)

## **8. Handling of Reports**

**8.1 Acknowledgement:** Upon receiving a report, the whistleblower will receive an acknowledgment (if contact details are provided) within 3 (three) working days.

**8.2 Investigation:** The Compliance Officer will conduct a preliminary review to determine the validity of the report.

- If the report warrants further investigation, an internal or external investigator will be appointed.

- All investigations will be conducted confidentially and fairly, ensuring no bias or conflict of interest.

### **8.3 Outcome**

- The outcome of the investigation will be communicated to the whistleblower (if contact details are provided).
- Appropriate actions will be taken based on the findings, which may include disciplinary action, policy changes, or legal action.

## **9. Protection for Reporters**

**9.1 Confidentiality:** CSL will protect the confidentiality of individuals who report suspected fraud, bribery, or corruption, unless disclosure is required by law.

**9.2 Protection from Retaliation:** Individuals who report concerns in good faith will be protected from retaliation, including dismissal, harassment, or any other detrimental treatment.

## **10. Training and Awareness**

**10.1 Training Programs:** CSL will provide regular training programs to all employees on the importance of preventing fraud, bribery, and corruption, and on how to identify and report suspicious activities.

**10.2 Awareness Campaigns:** Regular awareness campaigns will be conducted to educate employees and stakeholders about the risks of fraud, bribery, and corruption and the importance of maintaining a culture of integrity.

## **11. Monitoring and Review**

**11.1 Monitoring:** The effectiveness of this policy will be monitored regularly through audits, risk assessments, and feedback from employees and stakeholders.

**11.2 Review:** This policy will be reviewed annually and updated as necessary to ensure its continued relevance and effectiveness in preventing and addressing fraud, bribery, and corruption.