

## Our Fraud Prevention Commitment

Inizio is committed to maintaining the highest ethical standards throughout our operations. We have zero tolerance for fraud. We will take appropriate disciplinary and legal actions including possible employment termination, restitution, and the forwarding of information to the appropriate authorities for prosecution.

Fraud refers to intentional acts of deception or misrepresentation that are carried out with the goal of depriving Inizio of our property or assets. Any form of fraud, whether it involves unlawful or unethical conduct, the misrepresentation of financial results, or the theft or misuse of Inizio's assets including proprietary information will be addressed promptly, robustly, and in a manner consistent with applicable laws and regulations.

We recognize the importance of fraud risk management and are dedicated to mitigating the effects of fraud at every level of our organization. At Inizio, we prevent fraud proactively through the identification of inherent fraud risks, extensive internal controls, and fostering a culture of compliance. Any allegations of fraud will be taken seriously, with no exceptions.

Everyone working with us regardless of position, title, or tenure are expected to remain vigilant and report any suspicious activity via the channels detailed in our Speak Up Policy.

## Our Policy & Its Scope

### Scope of this policy

Our Fraud Risk Policy provides the controls which safeguard Inizio's corporate assets, maintain accurate financial reporting, and reinforce the interests of our stakeholders. This policy applies to:

- All Inizio locations, divisions, businesses, and affiliates, and
- All employees, contingent workers, contractors, and anyone who is engaged in activities acting on behalf of Inizio.

### Legal obligations, best practice, and transparency

Inizio is subject to various fraud-related legal and reporting obligations. If such obligations conflict with this policy or its associated processes, the applicable legal and reporting obligations always take precedence.

We support global and local initiatives to eliminate fraud, managing our risks in-line with best practice mechanisms such as the International Organization for Standardization's ("ISO") 31000 and the Committee of Sponsoring Organizations of the Treadway Commission's ("COSO") *Internal Control – Integrated Framework* and *Fraud Risk Management Guide*.

Inizio also provides transparency on who we are, what we do, and what matters to us at [inizio.health](https://inizio.health), including our annual reports and financial statements.

## Our Group Functions

Inizio will:

- Perform regular risk and control assessments to identify where fraud risk is most likely to materialize,
- Maintain detailed policies and procedures on how Inizio prevents, detects, and responds to fraud,
- Implement and maintain effective internal controls over financial reporting ("FR"),
- Monitor and report any material weaknesses in FR controls to the Inizio Audit Committee,
- Protect sensitive data with robust cybersecurity measures,
- Promptly investigate fraudulent activities discovered or reported through numerous channels including those established by our Code of Ethics and Speak Up Policy, and;
- Conduct *ex ante* background checks on potential employees and partners, especially those who will have access to sensitive financial information.

## Our Leaders and Managers

Business and functional leaders, and managers across Inizio will:

- Promote Inizio's Code of Ethics, setting the tone from the top in advocating for ethical conduct throughout the organisation,
- Provide effective oversight of our internal control systems, including the review of trends and unusual transactions,
- Implement and maintain effective entity level controls ("ELCs") to detect and prevent fraud across the organisation, and;
- Ensure all fraud-related training requirements are fulfilled, encouraging those who work with us to understand and adhere to this policy and its supportive ones, including but not limited to Inizio's:
  - Accounting Manual,
  - Anti-Bribery & Corruption Policy,
  - Competition Law Policy,
  - Code of Ethics, Supplier Code of Conduct, and Speak Up Policy,
  - Information Security and Acceptable Use of IT Resources Policies, and;
  - International Trade Control Policy.

## Our People and Personnel

Everyone at Inizio is responsible for fraud prevention. Those working with us will:

- Adhere to this policy and other related policies and procedures,
- Complete in a timely manner all fraud-relevant training, and other mandatory compliance learning,
- Be attentive for potential instances of fraud and highlight where internal controls could be strengthened to further protect Inizio from fraud, and;
- Immediately report any suspected fraudulent activities via the channels detailed in Inizio's Speak Up Policy. Inizio has zero tolerance for retaliation or retribution pertaining to such reports made in good faith.

This policy, together with our Codes and Commitments and the policies and procedures referenced herein, comprise Inizio's Fraud Risk framework. Please contact [compliance@inizio.health](mailto:compliance@inizio.health) with any questions pertaining to this policy or our framework.