



البنك العربي الوطني  
arab national bank

# Counter-Fraud Policy 2023

## Introduction

**anb's** Counter-Fraud Risk Management Framework includes the requirements relating to governance, prevention, detection and response and risk-based approach to fraud mitigation.

### 1. Objective

The Policy is established to prevent, detect, monitor, mitigate and report occurrence of the internal and external fraud in **anb**. The overall objective of the Policy is to set out the **anb's** position and its approach towards fraud while aligning with the **anb's** Counter-Fraud Strategy. The Policy includes **anb's** overall counter fraud objectives and scope while encouraging high moral standards such as integrity and lawfulness.

### 2. Applicability & Scope

The Counter-Fraud Policy applies to any actual fraud, suspected fraud, inherent fraud risk and emerging fraud involving employees (direct, insourced or outsourced), stakeholders, contractors & subcontractors, vendors and their employees, consultants, BoD, International branches & subsidiaries, **anb** customers across all of **anb's** products, services and channels and third parties.

### 3. Bank's Commitment

**anb**, its Senior Management and Board of Directors are committed to promote honesty, truthfulness, fairness, support fraud objectives and integrity in all aspects of its business. **anb** employees at all levels, irrespective of their position, level, or length of service, are also expected to lead by example in ensuring strict adherence to all regulations, Counter-Fraud Policies, Procedures, and the Code of Conduct.

**anb** employees and stakeholders must report all cases of fraud (internal and external) including suspicions of fraud through the reporting channels stipulated in Section 5 "Notification of Fraud and Suspicious Activities"

### 4. Definition of Fraud

Fraud is defined as any act involving deceit intentionally committed to obtain a direct or indirect benefit by the perpetrator or by others with his/her help. This can be caused by exploiting technical or documentary means, relationships or social means, using functional powers, or deliberately neglecting or exploiting weaknesses in systems or standards, directly or indirectly. Fraud is not necessarily limited to theft of cash and tangible benefits but may also include actions such as obtaining unauthorised access to physical assets or information by deceit, corruption, bribery, or any other misconduct.

#### Actions constituting fraud include, but not limited to-:

- Embezzlement of cash, debit cards, credit cards and other instruments;
- Counterfeiting or distorting documents including job applications, bills, contracts, cheques, eligibility or qualification certificates, identification documents, debit or credit cards, etc.;
- Forging signatures and stamps;
- Entering deliberately incorrect data in **anb's** systems;
- Misappropriation of funds, securities, supplies, or other assets;
- Bribery and Kickbacks;
- Profiteering as a result of insider knowledge gained through Bank activities;
- Unauthorised disclosure of business activities engaged in or contemplated by the Bank or its clients;

- Removal, or inappropriate use of records, office fixtures and equipment for achieving personal gains;
- Wilful blindness or deliberate inaction to prevent a fraudulent act;
- Leaking confidential information or having unauthorised access on such information;
- Facilitating and/or enabling any fraudulent activity; and
- Failing to report suspected or actual fraud.

## 5. Notification of Fraud and Suspicious Activities

All the employees, vendors, contractors, subcontractors, and other associated third parties are required to report any incident of suspected/actual fraud or any suspicious activity to Counter-Fraud Division, a written communication being the preferred method.

All the parties are enabled to report such events via:

Internal Fraud number report: 011-4029000 – (Ext.3344),

External Fraud number report: 011- 2904999

email: Fraudhotline@anb.com.sa

or in person by visiting **anb** Main office

In addition, Counter-Fraud Division will consider all confidentiality and integrity elements reported identities through Violation Reporting Unit (Whistle Blowing), in which whistle-blowers are empowered to report those events without unveiling their identities via the website: <https://tawasul.anb.com.sa/>, whistleblowing number: 011 – 4029000 – (Ext.1333) or e-mail: [wb@anb.com.sa](mailto:wb@anb.com.sa).

In case any person is not willing to notify Counter-Fraud Division or the Managing Director, they can directly report to SAMA for any incident of fraudulent activity.

**anb** has also established a dedicated toll-free number (80011060060) to report social engineering related incidents which is operative 24 hours to take immediate actions and better protect victimized clients.