FRAUD POLICY

This policy serves as a comprehensive framework for In Coatings' commitment to preventing, detecting, and responding to fraudulent activities. It emphasizes the importance of adherence to anti-fraud laws and regulations to protect the integrity of the organization.

PURPOSE

1.**Prevent Fraud**: In Coatings is dedicated to actively preventing fraudulent activities that may be perpetrated by employees, customers, or external vendors. We will implement strict policies and training programs that educate all personnel on recognizing and avoiding fraud, creating a culture of transparency and integrity.

2. **Respond and Investigate Promptly**: In the event of suspected fraudulent activities, In Coatings will take swift and decisive action. This includes thorough investigations of reports made by employees or external parties. The organization commits to notifying relevant regulatory authorities and law enforcement agencies as required by law, ensuring that all necessary legal steps are taken.

3. **Consequences for Employees**: Any employee found to have committed fraud will face serious repercussions. These consequences may include disciplinary action up to and including termination of employment, as well as potential legal action depending on the severity of the offense. This policy underscores that fraudulent behavior will not be tolerated.

4. **Compliance**: In Coatings is committed to full compliance with all applicable anti-fraud laws and regulations. We regularly review and update our policies and practices to align with legal requirements and industry standards, thereby promoting a lawful and ethical business environment.

5. **Open Dialogue**: We foster an environment of open communication where all employees feel safe to report suspected fraud. Employees are encouraged to voice their concerns without fear of retaliation. Anonymous reporting mechanisms will also be in place to ensure that anyone can report fraudulent activities confidentially.

6. **Audits and Risk Assessments**: Regular audits and risk assessments will be conducted to identify vulnerabilities within our operations. By assessing potential fraud risks, we can take proactive measures to strengthen our internal controls and enhance our ability to prevent fraud before it occurs.

In summary, this policy articulates In Coatings' robust strategy for addressing fraud, reinforcing our commitment to ethical practices, regulatory compliance, and the protection of our organization's assets.