

Anti-Fraud Policy

HOWDEN

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01 Scope

This Policy applies to all staff employed by or contracted to **Howden Insurance and Reinsurance Brokers (Phil.) Inc.**, hereinafter referred to as “**HIRBPI**” or “**the Company.**”

02 Objective

The purpose of this Policy is to set out how our Company meets its civic obligations for the prevention of fraud as defined under Article 315 of the Revised Penal Code, the Anti-Financial Account Scamming Act (AFASA – Republic Act No. 12010), the Cybercrime Prevention Act of 2012 (Republic Act No. 10175), and the Revised Corporation Code (Republic Act No. 11232).

In addition to the foregoing, being a member of the Howden Group, the Company is expected to adhere to certain UK legislation such as The Fraud Act 2006.

HIRBPI conducts all business in an honest and ethical manner, and we are committed to operating responsibly and to engage with our stakeholders to manage the ethical impact of our activities in the market in which we operate.

The aim of this Policy is to prevent fraud from occurring within the Company and that if any fraud is detected it must be reported to the Company and any significant fraud reported to the appropriate public authorities and industry bodies.

Everyone in the company is responsible for being honest, encouraging honesty in others and maintaining accountability for the responsibilities entrusted to them. The Policy can only be effective with everyone’s full cooperation, adherence and vigilance.

03 What is Fraud?

Fraud is the use of deception to obtain benefit, financial or otherwise. Fraud can include activity such as deception, bribery, forgery, some types of theft, conspiracy to defraud, embezzlement, false representation and collusion.

Both Article 315 of the Revised Penal Code and UK’s Fraud Act 2006 basically provides a general offence of fraud which can be committed by:

False representation is any dishonest representation with the intention of making a gain personally or for another party, OR to cause loss to another or expose them to risk of loss

Failure to disclose information refers to a failure to meet a legal duty to disclose with the intention of making a gain personally or for another party, OR to cause loss to another or expose them to risk of loss

Abuse of position refers to a position expected to safeguard, or not act against, the financial interests of another person. A person may abuse that position through an act or omission. The offence requires that the position is dishonestly abused with the intention of making a gain personally or for another party, OR to cause loss to another or expose them to risk of loss

The Anti-Financial Account Scamming Act (AFASA – Republic Act No. 12010) specifically targets social engineering schemes like phishing, vishing, and smishing, as well as money muling.

The Cybercrime Prevention Act of 2012 (Republic Act No. 10175) penalizes computer-related fraud, where the penalty is often one degree higher than that provided in the Revised Penal Code.

The Revised Corporation Code (Republic Act No. 11232) penalizes directors or officers who tolerate or fail to report fraudulent acts committed by the corporation with fines ranging from ₱500,000 to ₱1,000,000. The Securities and Exchange Commission can revoke the registration of a corporation if it finds any "falsity, misrepresentation or fraud" in its official filings.

Fraud may comprise deception by persons internal or external to the Company which is carried out to achieve unfair or unlawful gain. In business, fraud usually involves using some dishonest or illegal means to 'win'. Fraud can be committed by individuals or companies. A company may commit a fraud for example, through tax evasion or manipulation of results to encourage investment.

Examples of the types of fraud the Company may encounter include:

Internal Fraud

- Falsification of targets to claim unfair pay or bonuses
- Fraudulent submissions for non-existent or inflated expenses
- Theft of internal or customer data for personal use or sale
- Falsifying certificates or documents
- Creating bogus customer records
- Payment fraud - intercepting and altering payee details and amounts on cheques/invoices/debit notes, raising and self-authorising payments to oneself
- Procurement fraud - relating to a company purchasing goods, services or commissioning projects from third parties

External Fraud

- Theft of our data or resources
- Production of false certificates / documentation
- Submission of false invoices (e.g. for work not undertaken)
- Fraudulent companies – shell companies or impersonating legitimate companies
- Phishing – a digital form of social engineering that uses authentic looking, but bogus e-mails, to request information from users or direct them to fake websites site that request information (passwords / credit cards etc)
- Malware and Computer viruses – software that is specifically designed to disrupt, damage, or gain unauthorised access to a computer system

Insurance or Claims Fraud

- False Information – Clients providing false information or failure to disclose material facts, in order to obtain insurance cover on more favourable terms, or deliberately under-insuring to reduce the premium
- Fraudulent claims;
- Exaggerated losses
- False documentation
- Deliberate damage / loss of assets
- Inconsistent / vague information
- Claim made close to policy inception

04 Identity Fraud

Identity fraud is an increasing threat to colleagues and clients. HIRBPI controls a large amount of personal data, and it is essential colleagues protect that data from potential fraudulent misuse. Fraudsters may make

use of all kinds of personal data, including bank account information, credit card details, address, and date of birth information to perpetrate identity fraud. Identity fraud involves stealing another person's identity to obtain money or goods by deception. It is essential that all Employees protect any personal data they hold and comply with Data Protection Law to avoid any unauthorised release. Care must be taken with disposal of personal information and confidential waste procedures must be followed in all cases.

05 Guiding Principles

HIRBPI has a zero tolerance of fraud and will not tolerate fraudulent, dishonest or illegal activity amongst its colleagues, workers or its partners, contractors or suppliers under any circumstances. Anyone suspected of being involved in fraud against the Company will be subject to an investigatory process that may result in criminal prosecution and/or civil legal action.

All Colleagues should:

- take responsibility for effectively managing the fraud risks faced by the Company;
- comply with relevant fraud controls;
- deal with any suspected or actual fraud in accordance with the direction and requirements of Compliance;
- be empowered and supported by management to be able to identify and report suspicious or actual fraud activity within the Company;
- be aware and alert about fraud and assessing fraudulent behaviour;
- report (including making use of the Whistleblowing Policy where formal reporting may not be possible or appropriate in the circumstances) and escalate all suspected or actual fraudulent behaviour;
- assist with any fraud investigations conducted either internally or externally by law enforcement;
- undergo training and awareness on fraud and receive periodic training.

All Colleagues should not:

- engage in fraudulent activity;
- assist a client or another colleague in a conspiracy to defraud;
- ignore knowledge or suspicion of any fraud;
- "tip off" a fraudster, or prejudice an investigation into fraud if a disclosure has been made (a client should never be informed of any suspicions or reports made);
- conceal, disguise, convert, transfer or remove criminal property where they suspect that there has been fraud;
- obstruct any investigation into fraud by colleagues and external parties;
- take any further action, after making a report to the Compliance Officer, unless otherwise required by the said officer.

06 Employee Responsibilities

It is the personal responsibility of every Employee to act with the utmost integrity in the conduct of their professional duties. HIRBPI is committed to supporting and protecting all its Employees by providing the training and guidance required and implementing policies and procedures to prevent fraud. All Employees are required to adhere to these procedures and remain vigilant. Anyone violating the Company's policies may be subject to disciplinary action.

All Employees may consult with the Compliance Officer for guidance, when necessary.

07 Training and Awareness

HIRBPI will communicate the policies and relevant guidance to all Employees, through internal communication channels. Employees will receive relevant and specific training periodically on how to comply with the policies in the scope of their employment.

08 Review and Amendment

This Anti-Fraud Policy shall be reviewed periodically to ensure continued relevance and alignment with regulatory requirements and best practices.

Any amendment to this Policy shall require approval by the Board of Directors.

09 Effectivity

This Fraud Policy was approved on 30 March 2026 by the Board, as evidenced by Board Resolution dated 30 March 2026, and shall take effect immediately thereafter.

Version Control

Version:	Nature of Changes:	Prepared by:	Approved by:	Date:
1.0	First Issuance	Atty. Emmanuel G. Villanueva	Board of Directors	30 March 2026

The logo for Howden, featuring the word "HOWDEN" in a bold, blue, sans-serif font. The letters are closely spaced and have a slight shadow effect. The logo is positioned on the left side of the page, partially overlapping a large, light blue circular graphic element.