

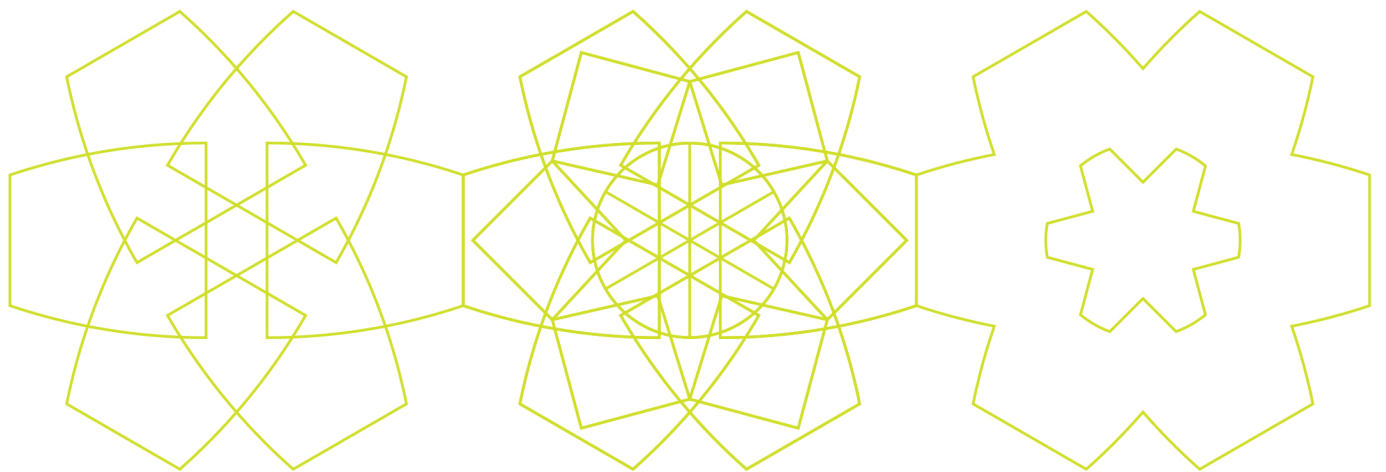


azoza.co.za

Anti-Fraud & Corruption Policy

for AZOZA Pty (Ltd.)
(Hereinafter referred to as "AZOZA")

Version No.: 3
Date: October 2025





POLICY STATEMENT

- Any reference to the “AZOZA” shall be interpreted to include the “policy owner”.
- AZOZA’s governing body, its employees, volunteers, contractors, suppliers and any other persons acting on behalf of the AZOZA are required to familiarise themselves with the policy’s requirements and undertake to comply with the stated processes and procedures.

POLICY ADOPTION

By signing this document, we authorise the AZOZA’s approval and adoption of the processes and procedures outlined herein.

Document Name	Version number	Date implemented
Anti-Fraud & Corruption Policy	1	June 2024
	2	May 2025
	3	October 2025

APPROVED BY	DESIGNATION	SIGNATURE
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1. Definitions

<p>Fraud</p>	<p>Fraud is a common law crime and is defined as “the unlawful, intentional misrepresentation of facts (distortion of the truth) calculated to prejudice another”.</p> <p>A fraudulent practice may therefore be described as any act or omission, including any misrepresentation, that knowingly misleads, or attempts to mislead, a party to obtain any financial or other benefit or to avoid any obligation.</p> <p>An example of fraud is where an employee inserts false information on a client’s claim form in order to derive some form of benefit from the resulting transaction.</p>
<p>Corruption</p>	<p>The general offence of corruption is criminalised in the Prevention and Combatting of Corrupt Activities Act. Section 3 of the Act defines the offence as follows:</p> <p>Any person who, directly or indirectly accepts, agrees or offers to accept any gratification from any person whether for the benefit of himself or herself or for the benefit of another person; or gives, agrees or offers to give to any other person any gratification, whether for the benefit of that other person or for the benefit of another person in order to act, personally or by influencing another person so to act in a manner that amounts to:</p> <ul style="list-style-type: none"> • illegal, dishonest, unauthorised, incomplete, or biased; or • misuse or selling of information or material acquired in the course of the exercise, carrying out or performance of any powers, duties or functions arising out of a constitutional, statutory, contractual or any other legal obligation; that amounts to: <ul style="list-style-type: none"> – the abuse of a position of authority; – a breach of trust; or – the violation of a legal duty or a set of rules; • designed to achieve an unjustified result; or • that amounts to any unauthorised or improper inducement to do or not to do anything, is guilty of the offence of corruption.

Corruption can manifest itself in various forms, including:

<p>Extortion</p>	<p>This is an act involving coercion by the employee to provide a benefit to such employee in exchange for acting or refraining to act in a particular manner by such employee.</p>
<p>Embezzlement</p>	<p>This act involves theft or misappropriation of resources by a person entrusted with the authority and control over such resources.</p>
<p>Favouritism</p>	<p>This is an act that involves the provision of financial services according to the personal affiliations of AZOZA and/or employee. For example, granting claims based on arbitrary grounds such as the client’s race, political and/or religious views.</p>
<p>Conflict Of Interest</p>	<p>This is an act or omission by the employee where such employee has an interest as a result of a relationship with AZOZA, another FSP or a person having the same interest. More specifically, the General Code of Conduct defines a conflict of interest as any situation in which AZOZA or a representative has an actual or potential interest that may, in rendering a financial service to a</p>



	client influence the objective performance of his, her or its obligations to that client, or prevent AZOZA or representative from rendering an unbiased and fair financial service to that client, or from acting in the interests of that client.
Bribery	The act of bribery involves the promise, offering or giving of a benefit or other advantage to another person in return for the person improperly performing a relevant function or activity. Bribery may also be used to participate in abuses such as fraud, the misuse of funds under management or the concealment of any documents evidencing such criminal activities.

2. Introduction

The purpose of this Policy is to prevent fraudulent, corrupt or collusive practices by:

- Communicating AZOZA's commitment to combatting and reporting fraudulent or corrupt activities
- Creating a general awareness concerning fraudulent and corrupt activities
- Adopting mechanisms to identify and manage instances of fraud or corruption
- Communicating the duties imposed on all employees

This document sets out AZOZA's policy and procedures relating to fraud, corruption and other acts of dishonesty. The policies and procedures outlined in this document are based on and reflect the principles set out in the Financial Advisory and Intermediary Services Act, the Financial Intelligence Centre Act, the Prevention and Combatting of Corrupt Activities Act, the General Code of Conduct, the Determination of Fit & Proper Requirements as well as the Generali Group Rules on this subject. This Policy also reflects the principles underlying the United Nations Convention against corruption as well as the Anti-Bribery Convention applicable to member countries of the Organisation for Economic Co-Operation and Development (OECD).

AZOZA is committed to at all times render services honestly, fairly, with due skill, care and diligence, and in the best interests of clients and the integrity of the financial services industry. To realise this commitment, AZOZA will devote itself to the elimination of fraud, corruption and other acts of dishonesty and ensuring that its activities are at all times conducted ethically and to the highest possible standard of openness and accountability.

Fraudulent, corrupt or other dishonest practices are contrary to AZOZA's core values and will not be tolerated. AZOZA recognises the adverse effect that such practices could have on its activities and reputation and is committed to preventing them and taking robust action where they are found to occur.

To achieve its purpose, AZOZA is in particular committed to preventing:

- Fraud and corruption perpetrated by its employees and/or clients;
- Fraud and corruption perpetrated against AZOZA by its employees, clients and/or other third parties; and
- Any collusive practices among any such parties, AZOZA does not, and shall not, tolerate any fraudulent and/or corrupt practices in the course of its operations and the rendering of financial services. AZOZA expects that all its employees adhere to the highest standard of integrity and that no contractual arrangements with clients, product suppliers or other third parties are tainted by fraudulent, corrupt or other dishonest practices.

All suspicions concerning fraudulent, corrupt or other dishonest practices will be promptly investigated. Should AZOZA elect to investigate and act upon alleged fraudulent, corrupt or other dishonest practices, there will be no



distinction drawn between cases that generate financial benefits and those that do not. Any instances of fraud, corruption or other similar dishonest practices will be treated as a very serious form of misconduct and any person or entity found to have engaged in these practices will be subject to AZOZA's disciplinary procedures.

The following prevention measures have been implemented in order to mitigate the risk of fraud and corruption:

- The promotion of a compliance culture
- Fraud and Corruption awareness training
- The implementation of internal controls
- The implementation of reporting mechanisms
- A commitment to investigating suspected instances of fraud and/or corruption
- The establishment of fixed sanctions

3. Gifts And Entertainment

No employee shall personally or through individuals acting on their behalf:

- Offer, promise or give undue payments, gifts, entertainment or other benefits to public officials, managers or employees of business partners (or their relatives or business associates); or
- Agree to or accept undue payments, gifts, entertainment or other benefits from public officials, managers or employees of business partners (or their relatives or business associates).

This prohibition includes not only bribes and kickbacks but improper benefits of any nature. Should you become aware of any undue payment, gift, entertainment or other benefit, report it to AZOZA's compliance department immediately.

Any gift or invitation for entertainment made to a public official requires the prior approval of AZOZA's compliance officer. AZOZA does not support any event or initiative of a political nature and makes no contributions to trade unions.

Please refer to AZOZA's *Gift Policy* for more information on what gifts may and may not be accepted.

4. Promotion of a Compliance Culture

AZOZA's Management and Key Individuals play an important role in creating and maintaining a compliance culture and will lead by example. AZOZA's Management is committed to instilling a compliance culture, sound corporate governance principles and ethics within AZOZA and will provide a strong, explicit and visible support to AZOZA's internal controls and measures that have been implemented in order to prevent and detect fraudulent and corrupt practices.

Key Individuals and other managers are expected to create an environment in which AZOZA's employees feel able to approach them with any concerns that they may have about suspected irregularities. Under no circumstances shall a Key Individual or any other manager of AZOZA engage in, condone or facilitate, or appear to condone or facilitate, any fraudulent, corrupt, collusive or other dishonest practices.



Employees are positively encouraged to raise any concerns regarding fraud and corruption, immaterial of seniority, rank or status in the knowledge that such concerns will wherever possible be treated in confidence. Clients of AZOZA are also encouraged to inform AZOZA if they suspect instances of fraud or corruption.

Any person associated with AZOZA is encouraged to raise concerns as soon as it is suspected that one or more of the following has occurred, is in the process of occurring or is likely to occur:

- A criminal offence
- A failure to comply with a statutory or legal obligation
- Improper or unauthorised use of AZOZA or client funds
- A miscarriage of justice
- A maladministration, misconduct or malpractice
- A transaction with no apparent business or lawful purpose
- A transaction relating to an offence or the financing of terrorist and related activities.
- An evasion or attempted evasion of a duty to pay any tax, duty or levy imposed by legislation
- The endangerment of an individual's health or safety
- Any damage to the environment
- A deliberate concealment of any of the above

AZOZA will ensure that any allegations received in any way, including by anonymous letter or telephone call, will be taken seriously and investigated in an appropriate manner. AZOZA will deal firmly with those individuals that defraud AZOZA or its clients, or whom are found guilty of corrupt practices in order to uphold and instil a culture of compliance within AZOZA.

In the spirit of promoting a compliance culture Management and Key Individuals of AZOZA are required to take active steps to prevent and detect fraud, corruption and any other acts of dishonesty. A visible commitment to eradicating fraud and corruption is demonstrated by Key Individuals and other managers:

- Setting the tone by acting ethically
- Ensuring that employees receive adequate training
- Encouraging employees to ask questions and obtain advice where uncertain as to how to act
- Protecting AZOZA's reputation
- Taking prompt action to correct instances of non-compliance

Key Individuals or other managers who fail to take appropriate action or whom in any way condone fraudulent, corrupt or related dishonest practices will be held accountable.

Each employee must realise that fraud and corruption, whatever its extent and form, is contrary to the standards of conduct expected from AZOZA and the financial services industry. To this end, employees are encouraged to promote a culture of compliance amongst their colleagues by:

- Setting the tone by acting ethically
- Encouraging colleagues to ask questions and obtain advice where uncertain as to how to act
- Protecting AZOZA's reputation
- Taking prompt action to report instances of non-compliance



Where fraud or corruption has occurred due to a breakdown in AZOZA's internal controls or reporting mechanisms, Management will ensure that appropriate improvements are implemented in order to prevent a recurrence of such breakdown.

5. Fraud & Corruption Training

In order to ensure that employees are aware of their respective roles and responsibilities, a plan for the communication, dissemination and building awareness of the Anti-Fraud & Corruption Policy is critical. Anti-fraud and corruption awareness training initiatives may entail:

- References to the Anti-Fraud & Corruption Policy in public information material or online resources;
- Training and education on how to comply with the Policy in relevant training programmes with an emphasis on induction material;
- Increasing general awareness associated with fraudulent and corrupt practices; and
- Developing skills for understanding, detecting, preventing and reporting fraudulent, corrupt and other dishonest practices.

Key Individuals and managers at all levels are responsible for the communication and implementation of this Policy. Management is also responsible for ensuring that employees are adequately equipped to identify and report any instances of fraud or corruption.

Management and Key Individuals are encouraged to provide additional awareness training and assessments where required.

6. Internal Controls

Where AZOZA has identified and assessed the risk of fraud and corruption within the regular risk framework of the organisation, Management is required to develop appropriate measures in order to minimise the risk through the application of internal control procedures.

Consistent with AZOZA's existing systems and policies, AZOZA shall establish measures in order to:

- Assess the probability/likelihood of the risk of fraud or corruption manifesting itself within AZOZA
- Assess the possible impact and reputational damage should AZOZA fall victim to instances of fraud or corruption
- Identify the areas of its operation that are most vulnerable to fraud or corruption
- Identify the actual or potential trends indicative of fraudulent or corrupt activities within the organisation
- Exercise due diligence in verifying that any client or other external third party has not engaged in, and is not engaging in fraudulent or corrupt practices
- Verify information received from clients and employees from other independent sources
- Exercise due care in managing client funds or other financial products
- Ensure the maintenance of fair and accurate accounting records
- Maintain accurate client file records and review client transactions
- Monitor, on a sample basis, client files related to the rendering of financial services
- Monitor correspondence, documents and other information related to other business activities that has relevance to the identification and prevention of fraud or corruption



- Encourage and provide positive support for the observance of ethics
- Inform clients and other third parties of AZOZA's commitment to abide by laws on the prohibition against fraud and corruption
- Ensure that contractual agreements with clients or other third parties expressly prohibit fraudulent or corrupt practices and refers to AZOZA's Anti-Fraud & Corruption Policy where applicable
- Exercise due diligence checks on prospective employees prior to appointment
- Cease any dealings with any party who is acting contrary to these Guidelines
- Take prompt and reasonable action to recover misappropriated funds or losses suffered due to fraud or corruption
- Notify the appropriate authorities in the event where instances of fraud or corruption has been confirmed or reasonably suspected to have occurred

As a further internal control, employees are expected to always be vigilant with regards to detecting instances of fraud or corruption. Potential indications that an individual may be susceptible to committing fraud are:

- The person has unusually high personal debts
- The person is living beyond his or her means
- The person has excessive gambling habits
- The person suffers from alcohol or drug problems
- The person experiences undue family or peer pressure to succeed
- The person constantly communicates a feeling of being underpaid
- The person constantly communicates the insufficient recognition for his or her job performance
- The person has a "wheeler-dealer" type attitude and a desire to "beat the system"
- The person has a criminal record
- The person does not take vacations
- The person refuses to allow another individual access to an area of responsibility
- The person has an actual or potential conflict of interest
- The person constantly provides rationalisation for conflicting behavioural patterns
- The person is not truthful

6.1 Honesty & Integrity

Legislation requires AZOZA to satisfy itself that its Directors, Key Individuals and representatives are at all times competent to act and able to satisfy the Fit & Proper requirement of honesty and integrity. To this end, AZOZA expects all its employees to, at all times, act in accordance with the highest standard of honesty and integrity.

The following factors are not exhaustive but constitute prima facie evidence that a person no longer satisfies the honesty and integrity requirement:

- Within the last 5 years, the person was found guilty in criminal proceedings or liable in any civil proceedings by a court of law (whether in the Republic or elsewhere) of having acted fraudulently, dishonestly, unprofessionally, dishonourably or in breach of a fiduciary duty
- Within the last 5 years, the person was found guilty by a statutory professional body or voluntary professional body (whether in the Republic or elsewhere) recognised by the Financial Sector Conduct Authority, of an act of dishonesty, negligence, incompetence or mismanagement



- Within the last 5 years, the person was denied membership to any statutory professional body or voluntary professional body (whether in the Republic or elsewhere) recognised by the Financial Sector Conduct Authority on account of an act of dishonesty, negligence, incompetence or mismanagement
- Within the last 5 years, the person was found guilty by a regulatory or supervisory body (whether in the Republic or elsewhere), recognised by the Financial Sector Conduct Authority, or had his or her authorisation to carry on business refused, suspended or withdrawn by any such body, on account of an act of dishonesty, negligence, incompetence or mismanagement
- Within the last 5 years, the person was disqualified or prohibited by any court of law (whether in the Republic or elsewhere) from taking part in the management of any company or other statutorily created, recognised or regulated body, irrespective of whether such disqualification has since been lifted or not

AZOZA's Key Individuals and representatives are required to sign an affirmation on a quarterly basis confirming that he or she is a person of honesty and integrity. A person who no longer satisfies the honesty and integrity requirement may be subject to disciplinary procedures.

6.2 Conflict of Interest

AZOZA and its employees shall avoid, and where avoidance is not possible, mitigate any conflict of interest between AZOZA and a client or the employee and a client. To this end AZOZA has adopted a Conflict of Interest Management Policy.

A conflict of interest may be defined as any situation in which AZOZA or an employee has an actual or potential interest that may, in rendering a service to a client influence the objective performance of his, her or its obligations to that client, or prevent AZOZA or the employee from rendering an unbiased and fair service to that client, or from acting in the interests of that client, including but not limited to a financial interest, an ownership interest or any relationship with a third party.

AZOZA's Key Individuals and representatives are required to sign an affirmation on a quarterly basis confirming that he or she has disclosed any actual or potential conflict of interest.

6.3 Recruitment

AZOZA recognises that a critical preventative measure in dealing with fraud and corruption is for AZOZA's HR staff to take effective steps at the recruitment stage to establish, as far as possible, the honesty and integrity of potential employees, whether for permanent, temporary or casual posts.

HR staff responsible for recruiting new employees shall, consistent with AZOZA's existing rules and other provisions, conduct due diligence and exercise due care during the recruiting process, regardless of rank or length of service. AZOZA's recruitment procedure may contain appropriate safeguards in the form of:

- Obtaining written reference letters with regards to previous employment history
- Verification of experience and qualifications held
- Verification of character qualities such as honesty and integrity
- Verification of completed regulatory examinations and continuous professional development requirements where applicable
- Verification of debarment status
- Background, credit and criminal checks



AZOZA shall monitor risks on an ongoing basis and regularly assess the effectiveness of internal controls. Internal controls may need to be revised where necessary in order to ensure their continued effectiveness to identify and prevent instances of fraud or corruption.

The Anti-Fraud & Corruption Policy is a working document which must be reviewed on an annual basis and relevant personnel must be informed of such changes.

7. Reporting Procedure

The prevention and detection of fraud and corruption is the responsibility of everyone both internal and external to AZOZA. AZOZA and its employees will not tolerate any forms of fraud or corruption by accepting any bribe for the concealment of any acts of dishonesty.

Employees have an obligation to report information pointing to fraud, corruption or any other acts of dishonesty to AZOZA's Compliance and Risk Department. Clients and other third parties with such information are strongly encouraged to report similar incidences.

The reporting responsibility includes all actual or suspected incidents of fraud, corruption, theft, maladministration or any other dishonest activities of a similar nature. All persons to whom this Policy applies shall promptly report any action or practice that is or may be in breach of this Policy, or any attempts thereof, in accordance with the procedures outlined in this Policy.

Any employee, client or other third party who discovers or reasonably suspects a case of fraudulent, corrupt and/or collusive practices, or any related attempts of such practices perpetrated by an employee, client or other external third party is required to report such discovery or suspicion promptly by way of any of the following facility/ies:

1. **By email:** compliance@AZOZA.co.za;
2. **By post:** Private Bag X20, Weltevredenpark Park, 1715;
3. **By telephone:** 011 991 9416; or
4. Directly to the Risk and Compliance Department

In the event of uncertainty as to whether any act or omission constitutes a fraudulent, corrupt and/or collusive practice, the employee, client or external third party may approach the Risk or Compliance Department for guidance.

8. Investigative Sanctions

All allegations reported to AZOZA will be investigated. Any investigation pursuant to this Policy shall be conducted impartially, fairly and thoroughly. AZOZA shall review, analyse and conduct a preliminary investigation of any allegations pursuant to this Policy and the Protected Disclosures Act in order to ascertain whether the allegation is sufficiently founded to warrant a full investigation. To this end, AZOZA may request further information to enable a proper assessment.

Where a matter is appropriate for a full investigation AZOZA will assign the case to an investigator who will conduct an objective investigation of all available facts ensuring the confidentiality for the parties concerned and affording protection to any witnesses where so required. A full investigation will include the collection and review of all



relevant documents, interviews of people who can provide information, and interviews with those alleged to be involved in fraud or corruption.

All investigations undertaken by AZOZA will be on a confidential basis and investigation participants (witnesses and subjects) are reminded of the need for confidentiality in the course of the investigation. Investigation reports and specific details of investigations are shared on a strictly “need to know” basis. Any information that is used and/or gathered as part of the investigation will not be disclosed to parties not involved in the investigation in order to protect all parties that are involved. However, this assurance cannot be given if it was held to be incompatible with a fair investigation or the matter has been referred to other regulatory or law enforcement bodies. Therefore, any requests for confidentiality by persons who reported the incident will be honoured to the extent possible to the legitimate need of the investigation and subject to the requirements of the Protected Disclosures Act.

Any detected irregularity will be further investigated and appropriate action will be taken, where necessary, to manage and mitigate the action and its consequences.

AZOZA will also coordinate with other fraud investigation and enforcement offices as appropriate, to ensure the effective investigation of fraud involving more than one person or where parties, external to AZOZA, are allegedly involved.

Management and Key Individuals are ultimately responsible for following up any allegation of dishonesty, malpractice, fraud or corruption by:

- Assessing what damage control measures need to be taken immediately
- Fully cooperating with investigating officers
- Dealing swiftly, fairly and firmly with the perpetrator
- Implementing sanctions where appropriate

8.1 Sanctions

Following an investigation, AZOZA may recommend that appropriate administrative, legal and/or disciplinary action be taken against any person or entity that is found to have contravened these Guidelines. The investigation may result in one or more of the following outcomes:

- A recommendation to commence disciplinary procedures against the employee
- A referral to the appropriate national law enforcement or prosecutorial agency for criminal investigation
- A referral to the Financial Sector Conduct Authority
- A recommendation to debar where the employee is a representative or Key Individual in terms of the FAIS Act
- Recovery of funds and assets

AZOZA regards theft, fraud and corruption as gross forms of misconduct for which an employee may be summarily dismissed. An employee suspected of having committed or attempted to commit an act of fraud, corruption, theft or maladministration following an informal investigation may be subject to formal disciplinary procedures.

AZOZA will commence with disciplinary procedures where it reasonably believes that it has secured sufficient evidence to indicate that an employee is guilty of fraud, corruption or other dishonest practices. AZOZA’s disciplinary procedures will be used to facilitate a thorough investigation of any allegations of improper behaviour.



The employee may be suspended during the investigation. If the employee is also a representative or key Individual in terms of the FAIS Act, the representative's authority to render financial services on behalf of AZOZA will also be suspended during the investigation. During a suspension AZOZA will ensure that immediate steps are taken to ensure that the suspension does not prejudice the interest of clients of the representative, and that any un-concluded business of the representative is properly concluded.

If at the conclusion of the investigation, misconduct is still alleged or suspected, a formal disciplinary hearing will be convened as soon as possible. AZOZA will not delay a disciplinary hearing to take account of any existing police investigations or other court proceedings.

AZOZA may inform the South African police service or any other law enforcement body if the investigating team believes that the suspected irregularity is of a serious nature, involving an amount of less than R100 000. However, where there is a reasonable suspicion that an employee or external third party has committed an offence of corruption, theft, fraud extortion or forgery involving an amount of R100 000 or more it will immediately report such suspicion to the police. Any suspected criminal offence that is reported to the police, may result in the employee being sentenced by a criminal court.

An employee will not necessarily be subject to formal disciplinary action as a consequence of arrest, charge or conviction for a criminal offence outside employment, although this may apply if the circumstances of the situation impinge in any way upon the individuals' employment position. AZOZA will assist all law enforcement bodies and its investigating officers where so required.

Section 17(1)(c) of the FAIS Act read in conjunction with section 19(4) requires the Compliance Officer to report and inform the Financial Sector Conduct Authority in writing of any irregularity or suspected irregularity in the conduct or the affairs of the

FSP or its representatives of which the Compliance Officer became aware in performing his or her functions as Compliance Officer, and which, in the opinion of the Compliance Officer, is material.

Whether an irregularity is material or not, will depend on the individual circumstances surrounding each case. AZOZA's scale and complexity of the business may also affect whether a particular irregularity is material or not. "Material" may be defined as being of real importance or great consequence. Reportable matters would thus be those that will have a significant adverse effect on the regulatory authorisation of AZOZA or its clients. For purposes of this Policy, any act, or suspected act of theft, fraud and/or corruption will be regarded as material.

AZOZA has a duty to ensure that its Key Individuals and representatives are at all times competent to act and able to satisfy the Fit & Proper requirement of honesty and integrity. Where AZOZA has sufficient information to conclude that a Key Individual or representative no longer satisfies the honesty and integrity requirement, or the representative has contravened or failed to comply with the FAIS Act in a material manner it will immediately withdraw the individual's authority to render financial services on its behalf.

Where AZOZA has concluded, following a disciplinary hearing, that a Key Individual or representative is no longer able to satisfy the honesty and integrity requirement, or the representative has contravened or failed to comply with the FAIS Act in a material manner, AZOZA will commence with debarment proceedings against the individual.

Upon proof that any employee, client or other external third party have engaged in fraud or corruption that has caused financial loss to AZOZA, AZOZA will seek restitution for any such loss. AZOZA may seek recovery using all means at its disposal, including legal action where appropriate. AZOZA will also report such external parties to the appropriate national authorities for investigation and criminal prosecution.