DOT COM ZAMBIA PLC

FINAL FOR PUBLICATION

# eToll Fraud Awareness and Response Protocol

*Operational protocol governing fraud prevention, reporting and response*

**Effective date:** 1 August 2026
**Version:** 2.0

## 1. Purpose and scope

This Protocol explains how Account Holders and Dot Com Zambia PLC (“DCZ”) must prevent, report, investigate and respond to suspected misuse of eToll Cards and Accounts. It supplements the eToll Account Terms and Conditions; the Terms prevail if there is an inconsistency.

## 2. Known fraud pattern

A known pattern involves a driver or fleet operator accepting cash or another benefit from drivers of other vehicles and using the Account Holder’s Card to pay multiple unauthorised tolls for those vehicles. A dishonest participant may then seek a refund or reversal for Transactions that were validly processed at the toll point. This conduct creates toll, refund, investigation and recovery losses and undermines the system.

## 3. Account Holder responsibilities

The Account Holder is responsible for safeguarding Cards, setting appropriate limits and vehicle restrictions, controlling drivers and administrators, reviewing Transactions, promptly blocking compromised Cards, and training personnel. It must maintain an accurate Card register and retain driver assignments, journey records and internal authorisations reasonably required to investigate activity.

- Use available platform controls to limit, restrict or block each Card.
- Reconcile Card activity against assigned vehicle journeys and toll records.
- Separate card custody, transaction review and refund-request authority where practicable.
- Investigate repeated rapid transactions, implausible vehicle movements, multiple vehicle classifications or unusual plaza patterns.

## 4. Immediate response

On discovering loss, theft or suspected misuse, the Account Holder must immediately block the affected Card through the platform, notify DCZ through the official fraud channel, preserve available evidence, restrict relevant internal access, and provide the information listed below. Blocking by the Account Holder takes effect when the platform records the block. A police report may be appropriate where criminal conduct is reasonably suspected, but DCZ may begin a contractual investigation without waiting for one.

- Account, Card, vehicle and authorised driver details;
- dates, times, toll points, amounts and disputed Transactions;
- why the activity is suspected, and relevant journey, employment, GPS or internal records;
- steps already taken, including blocking time and any police reference.

## 5. DCZ investigation and controls

DCZ may analyse Transactions, compare toll and vehicle records, obtain information from Toll Operators and payment providers, preserve platform evidence, request further documents, and interview relevant contacts. Account Holders control routine Card blocking and unblocking through the platform in real time. DCZ may separately suspend a Card, feature or Account for overdue payments, highly suspicious activity, security protection or another ground permitted by the eToll Account Terms and Conditions. An Account Holder cannot override or remove a DCZ-imposed suspension; only DCZ may lift it. During a proportionate investigation, DCZ may also restrict refunds, preserve balances or require stronger controls. DCZ will document material decisions and provide the Account Holder a reasonable opportunity to respond unless doing so would compromise security, evidence, legal duties or law-enforcement activity.

DCZ will acknowledge a disputed Transaction within 2 business days after receipt, or a flagged Transaction within 2 business days after identification. DCZ will resolve the matter within 21 business days after that receipt or identification. A request for additional information does not suspend this period. Where reasonably necessary, including because material information remains outstanding, DCZ may extend the period once by giving written notice before the original period expires, stating the reason and the revised decision date.

## 6. Allocation of losses

The Account Holder bears valid Transactions made using its Cards before the platform records an effective block, including misuse by its drivers, employees, contractors or persons to whom they provide access. The Account Holder is not responsible for Transactions completed after the platform records the block, unless the later Transaction resulted from the Account Holder's fraud, deliberate circumvention, credential sharing or another continuing material control failure. It also bears false or dishonest refunds, reversals and chargebacks, and reasonable documented investigation, administration, recovery and legal costs caused by its fraud or material control failure, to the extent permitted by law.

The Account Holder is not responsible to the extent the loss is caused by DCZ's proven fraud, wilful misconduct, negligence, or a platform or system failure that prevents or delays an effective block. DCZ may correct records, set off recoverable amounts and pursue lawful recovery. Loss allocation remains subject to mandatory law.

## 7. Decision and review

DCZ will notify the Account Holder of the investigation outcome, affected Transactions, restrictions and recoverable sums, subject to legal or security limits. The Account Holder may request an internal review without undue delay by identifying the disputed finding and providing new or overlooked evidence. DCZ may require further information reasonably needed to complete the review. Further disputes follow the process in the eToll Account Terms and Conditions.

## 8. Law-enforcement and information sharing

DCZ may report reasonably suspected criminal conduct and share relevant information with Toll Operators, payment providers, regulators and law-enforcement authorities where lawful and proportionate. Suspected misuse is not automatically described as a criminal offence; criminal responsibility is determined under applicable law.

## 9. Contact and version control

Fraud reports must be submitted to fraud@dotcomzambia.com. Urgent Account or Card support is available at support@dotcomzambia.com or +260 773 062 261. Complaints may be submitted to complaints@dotcomzambia.com. Registered office: Plot 22854, Off Leopard's Hill Road, Ibex, Lusaka. Effective date: 1 August 2026. Version: 2.0.