





**POLICY MANUAL**

**ANTI-BRIBERY AND ANTI-CORRUPTION (ABAC) POLICY**

This policy manual belongs to BERDE RENEWABLES, INC. and is issued to an authorized copyholder. The entitlement to hold a copy of this policy manual is attached to the position and not the individual; thus, the policy manual must be transferred to the succeeding occupant of the position, when applicable. All business activities shall be conducted in compliance with the policies set out in this policy manual. Any request for exemption from any provision of this policy manual must be submitted in writing and approved by the Board of Directors in cases when the exemption involves the CEO. The copyholder shall make this policy available to his/her subordinates that may need it in the performance of his/her assigned tasks.




# ANTI-BRIBERY AND ANTI-CORRUPTION (ABAC) POLICY

	Position	Signature	Date
<b>Prepared by:</b>  LEGAL & COMPLIANCE DIVISION	Head		June 3, 2025
<b>Approved by:</b>  PATRICK ZHU	CEO		June 2, 2025

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## 1. INTRODUCTION

### 1.1 PURPOSE

The Company takes its responsibility towards complying with applicable Anti-Bribery and Anti-Corruption laws with utmost importance and priority.

The purpose of this Anti-Bribery and Anti-Corruption ("ABAC") policy ("ABAC Policy" or "policy") is to:

- Set out the responsibilities of the Company and Company Representatives, in observing and upholding the laws against bribery and corruption;
- Provide guidance to Company Representatives on how to recognize and deal with bribery and corruption issues; and
- Set out principles and processes to avoid the bribery and corruption by third parties on its behalf and in its dealings with the third parties.

### 1.2 APPLICABILITY

This policy applies to Company Representatives<sup>1</sup> and Third Party Personnel<sup>2</sup>.

The policy prohibits anyone acting for or on behalf of the Company, directly or indirectly, from offering, promising, giving, accepting, receiving or soliciting any 'Improper Payment' or "Bribe" in order to influence any act or decision of a person, or otherwise gain an improper benefit.

Questions about the policy or its applicability to particular circumstances should be directed to the Compliance Officer. This policy is subject to no waivers or exceptions on the grounds of competitive or commercial demands, industry customs or other exigencies.




Violations of certain Anti-Corruption Laws may subject an individual to both criminal and civil liability including imprisonment.

### 1.3 SCOPE

This document describes the Company's policy prohibiting bribery and other improper payments or benefits in the conduct of the Company's business operations and also establishes the processes to ensure compliance with the ABAC Policy and applicable laws and regulations, in particular Philippine

<sup>1</sup> **Company Representatives** includes the company personnel, directors, associates, agents, advisors, consultants and all other persons or entities acting or purporting to act as a representative, advisor, or otherwise on behalf of the Company.

<sup>2</sup> **Third Party Personnel** are all individuals working for third parties including individuals on payroll, probationers, trainees, temporary staff, contractual staff or retainers who are contracted to work for or with the Company in any business function, in any country in which the Company operates.

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Republic Act No. 3815 also known as the Revised Penal Code of the Philippines (RPC), Philippine Republic Act No. 3019 also known as the Anti-Graft and Corrupt Practices Act, Republic Act 9485, The Anti-Red Tape Act of 2007, United States of America's Foreign Corrupt Practices Act, 1977 (FCPA) and the United Kingdom Bribery Act, 2010 (UKBA) ("Anti-Corruption Laws").

This document also considers the policy on Anti-Corruption Guidelines for International Finance Corporation (IFC) transactions and, in case of any ambiguity, this ABAC policy would prevail.

## 2. SOME FACTS ABOUT APPLICABLE ANTI-CORRUPTION LAWS

A summary of the applicability of the Anti-Corruption Laws and relevant prohibitions thereunder are set out under this policy. All Company Representatives and Third-Party Personnel should read and understand the application of such laws to the Company and to them.

### 2.1 PHILIPPINE REPUBLIC ACT NO. 3815, REVISED PENAL CODE OF THE PHILIPPINES (RPC), AND PHILIPPINE REPUBLIC ACT NO. 3019




The RPC prohibits direct and indirect bribery. **Direct bribery** is committed by a public officer who agrees to perform, or refrain from performing, an act in connection with his official duties in consideration of (or in exchange for) an offer, promise, gift, or present. The act may be a crime, an unjust act not constituting a crime, or refraining from a duty, and the act must relate to the officer's official functions. The transaction must involve a mutual agreement or understanding between the public officer and the giver of the bribe, whether express or implied. **Indirect bribery** is committed by a public officer who accepts a gift offered to him by reason of his office, without the need for an agreement to perform or refrain from performing an act in connection with his official duties.

### 2.2 ANTI-GRAFT AND CORRUPT PRACTICES ACT

The Anti-Graft and Corrupt Practices Act sets down several acts that are unlawful for public officers and in some cases, private individuals, including the following:

#### A. Corrupt Practices of Public Officers

- Persuading, inducing, or influencing another public officer to perform an act constituting a violation of rules, or an offense in connection with official duties.
- Requesting or receiving any gift, present, share, percentage or benefit, for himself or for any other person, in connection with any contract or transaction between the government and any other party, wherein the public officer in his official capacity has to intervene under the law.
- Requesting or receiving any gift, present or other pecuniary or material benefit, from any person for whom the public officer has secured or obtained, or will secure or obtain, any government permit or license.

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- Accepting or having any member of his family accept employment in a private enterprise that has pending official business with him, during the pendency thereof or within one year after its termination.
- Causing undue injury to any party, including the government, or giving unwarranted benefits, advantage, or preference in the discharge of official functions through manifest partiality, evident bad faith, or gross inexcusable negligence.
- Entering into contracts or transactions manifestly and grossly disadvantageous to the government, whether or not the officer profited.
- Other acts such as divulging confidential information, neglecting to act on matters for personal gain, or having financial interests in transactions requiring official intervention.

#### **B. Prohibited Acts by Private Individuals**

- Giving gifts or benefits to public officers in connection with government transactions.
- Inducing public officials to commit any of the offenses defined in the Anti-Graft and Corrupt Practices Act.
- Exploiting family or close personal relations with public officials to gain material or pecuniary advantage in government transactions.

### **2.3 FOREIGN CORRUPT PRACTICES ACT OF 1977 (FCPA)**

The FCPA prohibits offering to pay, paying, promising to pay, or authorizing the payment of money or anything of value to a foreign official (Foreign meaning Non-US) in order to influence any act or decision of the foreign official in his or her official capacity or to secure any other improper advantage in order to obtain or retain business or progression of business.

The prohibition under the FCPA is very broad, and covers:




- Cash payments;
- Non-cash 'payments', benefits, and favors; and
- In certain circumstances, even gifts, entertainment, and hosted travel or training which would otherwise be deemed legitimate business expenditures.

### **2.4 UNITED KINGDOM BRIBERY ACT, 2010 (UKBA)**

The UKBA goes beyond the requirements of the FCPA as it prohibits bribery not only in the public sector, but also in the private sector, both domestic and foreign. It also gives tremendous enforcement discretion to the prosecutors.

The UKBA is wider than the FCPA in three ways:



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- It applies to private sector bribery as well as public sector bribery wherever such acts are committed;
- There is no exemption for facilitating payments - even for U.S. companies - if they 'do business' in the U.K.; and
- Both U.K. and Non-U.K. companies doing business in the U.K. will have corporate liability for offences committed by agents or others performing services on their behalf.

### 3. PROHIBITED UNDER THE ABAC POLICY

#### 3.1 BRIBERY

Company Representatives and Third Party Personnel must not engage in any form of bribery (cash or in-kind), in dealings with any Public Official (defined below), private party or any third party (such as an agent or Third Party Intermediary) either directly or indirectly, in order to improperly influence any act or decision of a person, or to otherwise gain an improper benefit for the Company.

Bribe can take many forms, for example money (or cash equivalents such as shares), unreasonable gifts, entertainment or hospitality, kickbacks, unwarranted rebates, or excessive commissions (e.g., to sales agents or marketing agents), unwarranted allowances or expenses, political/charitable contributions, uncompensated use of company services or facilities, offers or promises (future benefits promised to influence official action), portions of profits or proceeds from government contracts, and anything else of value.




A **Public Official** or **Public Officer** is:

*Elective and appointive officials and employees, permanent or temporary, whether in the classified or unclassified or exempt service receiving compensation, even nominal, from the government. "Government" includes the national government, local governments, government-owned and controlled corporations (GOCCs), and all other instrumentalities or agencies of the Republic of the Philippines and their branches.*

#### 3.2 FACILITATION PAYMENTS

The Company prohibits all Company Representatives and Third Party Personnel from offering, promising, giving, accepting, receiving or soliciting any facilitation payments, directly or indirectly, on behalf of the Company.

'**Facilitation payments**' are payments made, or value given, for the purposes of facilitating or accelerating an action by a Public Official, or expediting or securing the performance of routine governmental action, such as processing permits, licenses, or other official documents (whether directly given to such Public Official or through an intermediary). For example, a payment to a customs official to speed up the release of goods from a customs warehouse, where the payment is outside the purview of normal course of business. Another example might be a cash payment to a

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Public Official to ensure that an application is approved more quickly than under the usual approval process.

## 4. COMPLIANCES

### 4.1 BUSINESS EXPENDITURE

Business expenditure incurred must be as per the approved norms in existence in the Company. The expenditures not in conformity with the Company norms or Policies shall be approved in writing by Compliance Officer and respective HODs<sup>3</sup>. In all cases, expenditures must be reasonable and directly related to a legitimate business purpose.

### 4.2 GIFTS

A gift is anything of value and would encompass any gratuitous monetary or non-monetary benefit. It includes tangible items such as cash, precious metals, stones, jewelry, art, and any of their equivalents, as well as intangible items such as discounts, services, loans, favors, special privileges, advantages, benefits, and rights that are not available to the general public, irrespective of its value.

This policy does not prohibit unsolicited gifts or presents of small or insignificant value (given and received) to or from third parties offered or given as a mere ordinary token of gratitude or friendship, in accordance with local customs or usage, and not given in anticipation of, or in exchange for, any favor or advantage.

As per the policy, giving or receiving of gifts or favors to or from anyone, by self or through third parties (as described in the Code of Conduct for Third Party), in an effort to sell products or services or to influence business, labor or governmental decision-making is strictly prohibited.




#### Offering or Giving Customary Gifts

Prior approval from the Compliance Officer and respective HOD shall be sought before offering or giving any customary gift to:

- Public Officials
- Private parties, if the value of the gift exceeds ₱5,000. This amount should be reviewed by Compliance Officer at regular intervals.

However, as per the Anti-Graft and Corruption Practices Act, there is an exception which is as follows: *"Unsolicited gifts or presents of small or insignificant value offered or given as a mere ordinary*

<sup>3</sup> **HOD** means respective units or **functional heads of the Company** like the human resources department, the purchase department, the marketing department, etc., as the context may require.

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*token of gratitude or friendship according to local customs or usage, shall be excepted from the provisions of this Act."*

There is no fixed peso amount for what is considered "*small or insignificant value*." Rather, the assessment is contextual and fact-specific. An unsolicited gift or present is considered "of small or insignificant value" under the Anti-Graft and Corrupt Practices Act if:

- It is nominal in amount,
- Given as a customary token of gratitude or friendship,
- Not given in anticipation of, or in exchange for, a favor,
- And is not manifestly excessive under the circumstances, as determined by local customs and usage.

It is also the responsibility of the Company Personnel to report to the Compliance Officer within three (3) days from the date of giving gifts to a Public Official, regardless of value, and to a private party if the value of the gift is equal to or less than ₱5,000.

A log must be maintained by the Compliance Officer for recording the date, gift item, amount incurred, name of the recipient, his/her title, and his/her entity to whom the gift was given.

### **Receiving Gifts**

Any gifts received by Company Personnel need to be reported to the Compliance Officer within three (3) days from the date of receiving gifts. Gifts received above the monetary value of ₱5,000 shall be at the discretion of Compliance Officer to be either retained by Company Personnel or to be returned to the giver or else to be retained by the Company.




The log maintained by the Compliance Officer must also record the date, gift item, amount of gift received, name of the giver, his/her title, and his/her entity from whom the gift was received.

### **4.3 MEALS AND ENTERTAINMENT**

Hospitality in the form of meals and entertainment may be provided to anyone (including Public Officials) in connection with a meeting for a legitimate business purpose, not intended to improperly influence the recipient, and if meals and entertainment are permitted under local law. Meals and entertainment are prohibited to family members or close business associates of a Public Official.

Prior written approval from Compliance Officer and respective HODs should be obtained before providing meals and entertainment expense for any:

- Public Officials, irrespective of the amount involved.
- Other than Public Officials (private parties), if the value of the meal and entertainment exceeds ₱1,500 per person.

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A log must be maintained by the Company recording the date, amount incurred, name of the Public Official, his/her title, and his/her Government Entity for whom meal or entertainment expense is incurred and the same shall be communicated to the Compliance Officer.

The government site or onsite office is the preferred meeting location or venue for meetings with government officials. However, secondary preference is made for location or venue which is conveniently located for the majority of the participants. The location or venue selected for a meeting with a government official shall be of suitable nature for discussing official business or professional purposes. Meetings should not be held at gaming or leisure destinations/resorts, locations that are considered lavish or extravagant, even if such locations or venues are within or below Company's cost policy limits.

#### 4.4 TRAVEL AND LODGING




Key policies for payments of travel and lodging expenses related to Public Official are as follows:

- The travel serves a bona fide business purpose and is not for personal or recreational purposes, and is not intended to improperly influence the recipient;
- The government agency, government department, or state-owned enterprise must select the invitees and not the Company;
- The government agency, government department, or state-owned enterprise must approve the proposed visit and itinerary;
- Tickets, hotel accommodation and other travel-related expenses need to be reasonable and commensurate with the Company's travel policies; and
- Travel will only be for the Public Official and not for his/ her family members or close business associates.

In certain circumstances, Company Representatives or Third Party Personnel may be required to pay reasonable travel and lodging expenses, for execution or performance of a contract or under applicable law or if ordered by a judicial authority, (including airfare, hotel accommodations, meals, and other incidentals) for or on behalf of anyone (who may or may not be a Public Official). Payment of travel and lodging expenses related to Public Official need to be reasonable and shall include tickets, hotel accommodation and other travel-related expenses. Company Representatives or Third Party Personnel shall directly pay airlines and hotels on behalf of the Public Official and will not reimburse any person.

**Note:** The Company may conduct seminars/summits/events at various locations and may also sponsor/partner various events. In all such events, the amenities extended to the third parties should not be considered as "Hospitality" for the purpose of this policy if it does not seem to be an inducement or attempt to influence them in an unfair manner.

#### 4.5 PETTY CASH EXPENSES FOR SITES

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A petty cash of an amount less than ₱20,000 can be given for expenses relating to site establishment (furniture and fixture), setting up of pantry at site (groceries, utensils and kitchen consumables), drinking water and fuel or for basic expenses incurred for site maintenance like groceries, vegetables, stationery items or medical emergencies.

Prior approval of Compliance Officer and the CFO should be obtained, in case of utilization of petty cash for more than ₱20,000 or for utilization of petty cash for nature of expense not falling in any of the above categories. Further, only small cash payments made from petty cash or in countries or locations where there is no banking system should be permitted. For any petty cash payments/purchases, invoices or payment receipts needs to be provided, wherever possible, and the same should be recorded as per the policy.

#### 4.6 POLITICAL CONTRIBUTIONS




The Company or Third-Party Intermediary shall not make donations or contributions, whether in cash or kind, in support of any political parties or candidates.

#### 4.7 CHARITABLE CONTRIBUTIONS

The Company endeavors to be a positive contributor to the development of the community. Before making any contribution or agreeing to sponsor an event, Company Personnel must take into consideration the following points:

- All requests need to be in writing documenting the nature, purpose, value and recipient of the Charitable Contribution<sup>4</sup>. Charitable organization must be registered with the relevant government agencies.
- If the Charitable Contribution is valued at less than ₱20,000, Company Personnel must obtain the prior written approval of the respective HOD and Compliance Officer. If the Charitable Contribution is valued at ₱20,000 or more, prior written approval from the Company's CEO is also required.
- All Charitable Contributions will be made by the Company and not by any Company Personnel in his/her individual capacity. The charitable contributions should be made by the Company to the charitable institution and not to any of its individual officer or member.
- Charitable contribution must not be made in order to win or influence a business deal or decision.
- All Charitable Contributions should be made only through cheque or appropriate banking channels and not in cash or cash equivalents. In case of any cash Charitable

<sup>4</sup> **Charitable Contribution:** Means any monetary or in-kind donation, contribution, gift, grant, etc., to any civic, charitable or community entity or for regional religious purpose where the Company's offices or operations are located at no charge for the purpose of supporting needy individuals or groups, providing an immediate benefit directly to members of the community, or for providing a benefit or better services to the community.

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Contributions to be made, necessary approval should be taken in advance from the Company's Board of Directors.

- All Charitable Contributions will be evidenced by a valid receipt/acknowledgement which should be documented and maintained on record.

In case of Charitable Contributions made by Third Party Intermediary(ies) (TPI) or by the Company, the TPI(s) or the Company must consider that due diligence be conducted on the recipient entity and its key personnel to ensure that TPI(s) or the Company is not exposed to any risk of adverse publicity or contentions that the charity is not valid. This process must include a background check on the entity and the key individuals and their relationships with Government Entity(ies) and officials and Politically Exposed Persons, if any, to confirm that the contribution is not subject to allegations that it is a political contribution or a form of bribery.

Please note that due diligence is critical to ensure that the Charitable Contribution is not a conduit for facilitating any illegal activities under anti-money laundering/anti-corruption laws, anti-terrorism laws, or any other applicable laws.

#### 4.8 INSPECTION BY PUBLIC OFFICIAL




- In case of inspection by any Public Official, the Company Personnel should direct the Public Official to the Compliance Officer or to the authorized person;
- A log must be maintained on site at the Company premises or project sites or corporate office to record the date, name of Public Official, title and his/her Government Entity and purpose of each visit. This log will be maintained by site-in-charge/ local officer in-charge at site and project sites and Compliance Officer; and
- If any expenses including any meals, travel or lodging are incurred during the inspection, these expenses must be recorded and must be consistent with this policy.

#### 4.9 FINES AND PENALTIES

Each fine or penalty should have adequate supporting evidence in the form of a written acknowledgement or receipt from the Government Entity along with an approval of the respective HODs and the CEO is required.

#### 4.10 REAL ESTATE TRANSACTIONS

- All real estate transactions and their related expenditure will be made directly by the Company and should not be routed through Company Personnel or its third-party agents.
- All payments relating to real estate transactions will be evidenced by a valid receipt/ acknowledgement that should be documented and maintained on record.
- Screening of the Company Personnel, who are part of the real estate acquisition project team, needs to be undertaken to ensure that they are not related in any manner to the owners/related persons of the property in question.

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#### 4.11 EMPLOYEE DUE DILIGENCE/BACKGROUND VERIFICATION CHECKS

- Prior to hiring of employees, HOD/HR department must initiate the process of employee due diligence/background verification checks on the prospective employee. Employee due diligence/background verification checks are conducted for all selected candidates across all levels. These background checks typically entail verifications of education, previous employment, reference, criminal record, address and economic defaults database.
- In the context of Directors & Senior Management, background verification checks also include verification of (i) medical fitness (usually through production by the individual of prescribed certificates from physicians, test results etc.); (ii) reputation and integrity; (iii) involvement in any disputes, controversies, or unethical activities; (iv) political association or affiliations; (v) global regulatory and compliance defaults; (vi) credit defaults.

#### Purpose of Employee Due Diligence/Background Verification checks is also to identify:

- i) any relationship between the prospective employee and Public Official(s)/ Government Entity (ies)/ Politically Exposed Person (PEP).
  - ii) any direct or indirect relationship with any current or previous employee.
  - iii) any significant or material breaches or violations (that may have formed grounds for termination) in any organization in last 5 years including actions taken.
  - iv) all properties and assets owned by the potential employee.
- The Company may appoint a service provider to conduct the due diligence review for prospective employees. The service provider may be an internal group, an outside auditing firm or outside counsel etc. and will conduct the risk-based due diligence as per instructions from the Company.
  - Employment or appointment of a prospective employee should be confirmed only upon receipt of an unqualified and clean report or after satisfactory explanation to the internal compliance committee provided by the candidate regarding any discrepancy in the screening reports or background verification reports.
  - All internal records regarding the suitability of a candidate appointed as an employee in the Company should be maintained such that such appointments can be justified subsequently, especially in case the allegations of impropriety are raised with respect to such appointments, whether internally or externally.
  - Any deviation in the process for appointment of employees in the Company should be captured as part of the internal standard operating procedure adopted by the Company in order to ensure that such deviations are applied uniformly.

#### 4.12 RECORD KEEPING

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- Company Personnel must follow all applicable standards, principles, laws, regulations and Company practices for accounting and financial reporting. In particular, all required reports and records prepared by Company Personnel must be timely, complete and accurate.
- All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts should be kept "off-books" to facilitate or conceal improper payments. However, any such information or document /record that may be relevant to current or threatened litigation or subject to a legal prohibition or stipulation, may be retained as it is, until it is authorized in writing to be destroyed by the Legal department, upon the conclusion of such litigation or cessation of the anticipated legal proceedings.
- In particular, the Company will monitor and review business expenditures and records of the Directors or those employees who have discretionary authority over Company assets, or who are likely to come into contact with Public Official(s), or who submit financial data that affects Company's financial statements. In addition, the Company shall maintain a system of internal accounting controls sufficient to provide reasonable assurances that:
  - transactions are executed in accordance with Management's general or specific authorization;
  - access to Company's assets is permitted only in accordance with Management's general or specific authorization; and
  - the recorded accountability for corporate assets is compared with the existing assets at reasonable intervals and appropriate action is taken with respect to any differences.

TPI(s) are also required to follow all applicable standards, principles, laws, regulations, and Company practices for accounting and financial reporting. In particular, TPI(s) must furnish complete and accurate information in a timely manner for all the required reports and records.




#### **4.13 DOCUMENT RETENTION**

Unless Philippines law requires a longer period, Company and TPI(s) shall retain all documents related to the expenditure for ten (10) years from the day following the deadline in filing a return, or if filed after the deadline, from the date of the filing of the return [five (5) years for hard copies and the last five (5) years may be stored in electronic format.

#### **4.14 RISK ASSESSMENTS AND COMPLIANCE AUDITS**

The Company may conduct periodic risk assessments and compliance audits either through Compliance Officer or any other party to ensure compliance of the above.



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## 5. REPORTING OF VIOLATIONS

- Company Representatives and TPI(s), who are or become aware of or suspect a violation of this policy and/or the ABAC laws are under an obligation to report the same to the Compliance Officer.
- Violations or suspected violations should be reported by contacting the Compliance Officer or reporting as per the procedures set out in the Company's Whistleblower Policy. Reporting may also be made anonymously at [legal@berderenewables.com](mailto:legal@berderenewables.com).
- Failure to report an actual or suspected breach of this policy is itself, a breach of this policy.
- If an individual is unsure whether a particular act constitutes bribery or corruption, he/she should raise the matter with his/her reporting authority or consult with Compliance Officer.

## 6. TRAININGS AND COMMUNICATIONS




- Dissemination of this policy for new joiners shall be carried out at the time of induction by the Compliance Officer.
- Annual refresher trainings on the ABAC compliances are required to be conducted for all Company Representative and TPI(s) of the Company. The training will be given through either online learning modules or in person.

## 7. ROLES AND RESPONSIBILITIES

The Director nominated by the Company's Board of Directors, if any, along with the CEO, CFO and Compliance Officer are responsible for providing leadership, resources and active support for the implementation of this policy. Management at all levels is responsible for ensuring that employees reporting to them are made aware of and understand this policy and if necessary, are given adequate and regular training on the same.

The Compliance Officer under the overall supervision of the Legal Head shall be responsible for the following activities:

- Undertake regular ABAC risk assessment(s) at least annually to identify the bribery and corruption risks the Company might reasonably anticipate;
- Monitor the effectiveness and review the proper implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvement identified will be made and incorporated at the earliest;
- Subject internal control systems and procedures to regular audits to provide assurance that they are effective in countering bribery and corruption;
- Ensure timely trainings on the ABAC Policy to all the Company Representatives and TPI(s);

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- Ensure, at least, the annual certification from the Company Representatives and TPI(s) on compliance with the ABAC Policy;
- Encouraging the use of reporting procedures for suspected and actual incidence of bribery or corruption;
- Ensure that Company Representatives and TPI(s) will not suffer retaliation, discrimination or disciplinary action for reports made in good faith, or on the basis of a reasonable belief of violation or suspected violation of the Company's ABAC Policy, or for refusing to engage in bribery, even if such refusal can result in the Company losing business (except where the individual participated in the violation);
- Receiving and investigating reports of ABAC related incidents;
- Monthly, obtain and review the list of high-risk expenses such as gifts, donations, fines and penalties, hospitality, and entertainment, etc.;
- Escalating known ABAC issues to the Company's Board of Directors;
- Providing guidance to employees on the ABAC Policy and dealing with any queries on its interpretation;
- Recordkeeping in connection with the ABAC Policy and associated training.

## 8. REVIEW AND REVISION OF THIS POLICY

This policy shall be reviewed and revised, as and when deemed necessary, by the Company.

## 9. VIOLATION OF THIS POLICY

In addition to any other civil or criminal actions, the Company reserves its right to terminate a contractual relationship with the Company Representative(s) and TPI(s), as the case may be, if they breach any of the terms and conditions of this policy.

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## POLICY CHANGE HISTORY

Version number	Section/sub-section amended	Proponent	Date of approval of amendment