

Anti-Bribery and Corruption Policy

1. Purpose

The purpose of this Anti-Bribery and Corruption Policy (the "Policy") is to ensure that Solargy Pte. Ltd. conducts business in an honest and ethical manner, adhering to all applicable laws and regulations regarding bribery and corruption. The Policy sets forth the Company's zero-tolerance approach towards bribery and corruption and outlines the responsibilities of the Company, its employees, and associated third parties in preventing and addressing such practices.

2. Scope

This Policy applies to all employees, officers, directors, contractors, consultants, agents, and any other third-party representatives acting on behalf of the Company. It covers all activities conducted by the Company across all jurisdictions in which it operates.

3. Definitions

- **Bribery:** The offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal, unethical, or a breach of trust. This can include cash, gifts, hospitality, expenses, reciprocal favours, political or charitable donations, or any other advantage or benefit.
- **Corruption:** The abuse of entrusted power for private gain. It includes bribery but also other acts such as fraud, extortion, collusion, money laundering, and nepotism.
- **Facilitation Payments:** Small unofficial payments made to secure or expedite routine government actions by a government official.

4. Policy Statements

4.1 Prohibition of Bribery and Corruption

The Company strictly prohibits:

- Offering, giving, or receiving bribes or any other form of improper payment, including facilitation payments.
- Engaging in any form of corrupt activity, directly or through third parties.

4.2 Gifts and Hospitality

- Employees must not offer or accept gifts, hospitality, or other benefits that could influence or appear to influence a business decision.
- Any gifts or hospitality must be:
 - Of nominal value.
 - Given in good faith and without expectation of reciprocity.
 - Transparent and properly recorded in the Company's books and records.
- Prior approval from the relevant department head is required for any gift or hospitality that exceeds a nominal value.

4.3 Political and Charitable Contributions

- The Company does not make contributions to political parties, organizations, or individuals engaged in politics as a way to obtain an improper business advantage.
- Charitable donations and sponsorships must be transparent, not made to secure improper advantages, and approved by the compliance officer.

4.4 Third-Party Relationships

- The Company expects third parties acting on its behalf to adhere to the principles set out in this Policy.
- Due diligence must be conducted before engaging third parties to ensure their compliance with anti-bribery and corruption laws.
- Contracts with third parties must include provisions to comply with this Policy.

5. Responsibilities

5.1 Employees

- Employees must read, understand, and comply with this Policy.
- Employees must report any concerns or suspicions regarding potential bribery or corruption to the Compliance Officer or through the Company's whistleblowing channels.

5.2 Management

- Managers are responsible for promoting a culture of integrity and compliance within their teams.
- Managers must ensure that their team members are aware of and understand this Policy and their obligations under it.

5.3 Compliance Officer

- The Compliance Officer is responsible for overseeing the implementation of this Policy.
- The Compliance Officer must conduct regular risk assessments and audits to ensure compliance with the Policy.
- The Compliance Officer must ensure that employees receive adequate training on anti-bribery and corruption practices.

6. Reporting and Whistleblowing

- Employees must report any incidents or suspicions of bribery or corruption. Reports can be made anonymously through the Company's whistleblowing hotline or directly to the Compliance Officer.
- The Company will not tolerate retaliation against anyone who reports a concern in good faith.

7. Enforcement and Disciplinary Actions

- Any employee found to be in breach of this Policy will face disciplinary action, up to and including termination of employment.
- Third parties that fail to comply with this Policy may have their contracts terminated and be reported to the appropriate authorities.

8. Training and Communication

- The Company will provide regular training to all employees on the principles and requirements of this Policy.
- This Policy will be communicated to all employees and relevant third parties and will be available on the Company's intranet and website.

9. Monitoring and Review

- The Compliance Officer will regularly review the effectiveness of this Policy and recommend updates as necessary.
- The Policy will be reviewed annually by the Board of Directors.

10. Approval and Implementation

This Policy has been approved by the Board of Directors and is effective as of [Date]. It is the responsibility of all employees and associated third parties to adhere to the principles and requirements set out in this Policy.

By adhering to this Anti-Bribery and Corruption Policy, Solargy Pte. Ltd. commits to conducting business ethically, legally, and with integrity.