

POLICY STATEMENT

Bluecircle practises a ‘**ZERO TOLERANCE**’ policy against all forms of bribery and corruption.

Bluecircle is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices. It is our company’s policy to conduct all the business activities with honesty, integrity and the highest possible ethical standards and vigorously enforce our good business practices.

“Bribery” – Bribery is defined as any action which would be considered as an offence of giving or receiving ‘gratification’ under the MACC Act. In practice, this means offering, promising, giving, solicitation or the receipt or agreement to receive any financial or other advantage, or any other inducement, or “gratification” (as defined and interpreted under Section 3 of the MACC Act) from any person or company, (wherever they are situated and whether they are a public official or body, or a private person or company) by an individual employee, agent or other person or body acting on another’s behalf. Bribery can take a variety of forms, whether in cash or in kind, can be given or received directly or indirectly through intermediaries, when someone improperly influence or attempts to improperly influence one’s decision or performance of duties.

“Corruption” – Corruption is broadly defined as the abuse of entrusted power for private gain.

This Policy is intended provide the principles and guidelines on how to deal with instances of activities which may constitute bribery and corruption practices.

SCOPE AND COVERAGE

This Policy applies to all Directors and Employees of the Group.

This Policy should also apply to agents, business associates, consultants, contractors, customers, distributors, joint venture partners, sponsors, suppliers, volunteers, the government, public bodies, any third-party and any other person associated with our company. Any arrangements our company makes with a third party is subjected to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures that are set out in this Policy.

Each Director or Employee as well as persons associated with our company must read and understand the Policy. Violation of any of the Policy’s provisions may lead to disciplinary actions, including termination of employment and / or business dealings. Further legal action may also be taken in the event that the Company’s interests have been compromised.

COMBATING BRIBERY, CORRUPTION AND UNETHICAL ACTIVITIES

1. Solicitation, Bribery and Corruption

Employees are refrained, directly or indirectly, to solicit, pay, offer, accept or receive a bribe in any form in connection with any business or anticipated future business involving Bluecircle. Employees are strictly not allowed to:

- a. Promise, offer, pay or give a bribe to anyone
- b. Request, accept or take a bribe from anyone
- c. Act corruptly and illegally in dealings with any person
- d. Give some advantage inconsistent with the law and wrongful or unlawful use of official position to procure some benefit or personal gain

2. Conflicts of Interest

Conflicts of interest happens when any person or company is involved in multiple interests, which could possibly corrupt, or be viewed to corrupt. A conflict of interest may be actual, potential or perceived and may be financial or non-financial.

It is the responsibility of Bluecircle and all the employees that any ethical, legal, financial or other conflicts of interest be avoided.

3. Gifts and Hospitality

The gifts and hospitality, whether they are given or received, are allowed only if they are reasonable, not lavish, appropriate and consistent with the business and industry practice.

Employees must make use of good judgement, discretion and moderation when giving or accepting such courtesies in business settings and must comply with all applicable laws, rules and regulations.

4. Donations and Sponsorships

Donations and sponsorships are not to be used as a means for bribery. All donations and sponsorships can only be made or received from any party provided:

- a. Such contributions are appropriate and comply with all legal requirements
- b. They are not made to secure any improper business or other advantage
- c. They have been subjected to due diligence and management approval

No political donations or payments are allowed.

WHISTLEBLOWING AND REPORTING OF A CONCERN

To encourage openness and transparency, we have provided an accessible and trusted channel for all employees of Bluecircle, members of the public and all third parties engaged by Bluecircle, to disclose or report any suspected or improper conduct in relation to anti-bribery and corruption.

All disclosures or reports can be channelled via email to the Compliance Team of Bluecircle at whistleblowing@addibluecircle.com.