



SundaGas Anti Bribery Policy and Procedures

Policy Statement - Anti Bribery

Bribery is a criminal offence. SundaGas has zero- tolerance towards bribery. We do not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor do we or will we, accept bribes or improper inducements.

To use a third party as a conduit to channel bribes to others is a criminal offence. We do not, and will not, engage indirectly in or otherwise encourage bribery.

We are committed to the prevention, deterrence and detection of bribery. We aim to maintain anti-bribery compliance “business as usual”, rather than as a one-off exercise.

Objective of this policy

This policy provides a coherent and consistent framework to enable SundaGas employees to understand and implement arrangements enabling compliance. In conjunction with related policies and key documents it will also enable SundaGas employees to identify and effectively report a potential breach.

We require that all personnel, including those permanently employed, temporary staff and contractors:

- act honestly and with integrity at all times and to safeguard the organisation’s resources for which they are responsible
- comply with the spirit, as well as the letter, of the laws and regulations of all jurisdictions in which the organisation operates, in respect of the lawful and responsible conduct of activities

Scope of this policy

This policy applies to all of SundaGas activities. For partners, joint ventures and suppliers, we will seek to promote the adoption of policies consistent with the principles set out in this policy.

Within SundaGas, the responsibility to control the risk of bribery occurring resides at all levels of the organisation, in all business units and corporate functions.

This policy covers all personnel, including all levels and grades, those permanently employed, temporary staff, contractors, non-executives, agents and consultants.

SundaGas commitment to action

SundaGas commits to:

- Setting out a clear anti-bribery policy and keeping it up to date
- Making all employees aware of their responsibilities to adhere strictly to this policy at all times

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- Training all employees so that they can recognise and avoid the use of bribery by themselves and others
- Encouraging its employees to be vigilant and to report any suspicions of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- Rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in any resultant prosecution
- Taking firm and vigorous action against any individual(s) involved in bribery
- Provide information to all employees to report breaches and suspected breaches of this policy
- Include appropriate clauses in contracts to prevent bribery.

Bribery

Bribery is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage. SundaGas anti-bribery policy is based on, and uses guidelines accompanying, the UK Bribery Act 2010. There are four key offences under the UK Bribery Act:

- bribery of another person
- accepting a bribe
- bribing a foreign official
- failing to prevent bribery

Bribery is not tolerated. It is unacceptable to:

- give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
- give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return
- retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy
- engage in activity in breach of this policy.

Facilitation payments

Facilitation payments are not tolerated and are illegal. Facilitation payments are unofficial payments made to public officials in order to secure or expedite actions.

Gifts and hospitality

Reasonable, proportionate gifts and hospitality made in good faith and that are not lavish are acceptable. A guideline amount in this regard is a limit of US\$100 of value for any gift or hospitality.



Staff responsibilities

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for SundaGas or under its control. All staff are required to avoid activity that breaches this policy. Staff must:

- ensure that they have read, understood and comply with this policy
- raise concerns as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

As well as the possibility of civil and criminal prosecution, staff that breach this policy will face disciplinary action, which could result in dismissal for gross misconduct.

Raising a concern

SundaGas is committed to ensuring that all of us have a safe, reliable, and confidential way of reporting any suspicious activity. We want each and every member of staff to know how they can raise concerns.

We all have a responsibility to help detect, prevent and report instances of bribery. If you have a concern regarding a suspected instance of bribery or corruption, please speak up – your information and assistance will help. The sooner you act, the sooner it can be resolved.

Any concerns should be raised with a member of the management team or to the CEO. Where internal disclosure proves inappropriate, concerns can be raised with a non-executive director.

Concerns can be anonymous. In the event that an incident of bribery, corruption, or wrongdoing is reported, we will act as soon as possible to evaluate the situation. We will immediately investigate fraud, misconduct and non-compliance issues. This is easier and quicker if concerns raised are not anonymous. Staff who refuse to accept or offer a bribe, or those who raise concerns or report wrongdoing can understandably be worried about the repercussions. We aim to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring nobody suffers detrimental treatment through refusing to take part in bribery or corruption, or because of reporting a concern in good faith.

If you have any questions about these procedures, please contact your reporting head or the CEO.

Dr. Andy Butler
Chief Executive Officer