

# Anti-Bribery and Corruption Policy

## Introduction

ADAMftd Pte Ltd is dedicated to maintaining the highest standards of integrity, transparency, and accountability in all our business practices. This Anti-Bribery and Corruption Policy outlines our commitment to preventing and addressing bribery and corruption in all forms. Our goal is to ensure ethical conduct throughout our operations and supply chains, supporting a fair and just business environment.

## Policy Statement

We have a zero-tolerance approach to bribery and corruption. All employees, contractors, suppliers, and business partners must comply with this policy and all applicable anti-bribery and corruption laws. This policy is aligned with our broader commitment to ethical business practices, as detailed in our Code of Conduct, Supplier Code of Conduct, Whistleblower Policy, and Anti-Slavery Policy.

## Scope

This policy applies to all employees, directors, officers, contractors, suppliers, and any third parties acting on behalf of ADAMftd Pte Ltd, regardless of location.

## Prohibited Activities

- **Bribery:** Offering, giving, receiving, or soliciting anything of value to influence the actions of an individual in a position of trust.
- **Facilitation Payments:** Small payments made to expedite or secure the performance of a routine governmental action.
- **Gifts and Hospitality:** Providing or accepting gifts, hospitality, or entertainment that could be perceived as a bribe or influence decision-making.
- **Kickbacks:** Payments made in return for a business favor or advantage.

## Responsibilities

- **Employees and Contractors:** Must adhere to this policy and report any suspected or actual breaches through the Whistleblower Policy. Employees should avoid situations where personal interests conflict, or appear to conflict, with the interests of ADAMftd.
- **Suppliers and Partners:** Must comply with our Supplier Code of Conduct and ensure that their operations and supply chains are free from bribery and corruption.

## Risk Management and Due Diligence

- **Risk Assessments:** Conduct regular risk assessments to identify and mitigate bribery and corruption risks.
- **Due Diligence:** Perform thorough due diligence on all prospective business partners, suppliers, and contractors to ensure compliance with anti-bribery and corruption standards.

## Training and Communication

- **Training:** Provide regular training to employees and contractors on anti-bribery and corruption practices.
- **Communication:** Ensure clear communication of this policy to all employees, suppliers, and business partners.

## Reporting and Whistleblowing

- **Reporting Mechanisms:** Encourage employees and third parties to report any concerns or violations through our Whistleblower Policy. Reports can be made confidentially and without fear of retaliation.
- **Non-Retaliation:** Maintain a strict non-retaliation policy to protect whistleblowers.

## Compliance and Monitoring

- **Internal Audits:** Conduct regular audits to ensure compliance with this policy and identify any areas for improvement.
- **Monitoring:** Continuously monitor and review our operations and supply chains to prevent and address bribery and corruption.

## Enforcement and Disciplinary Actions

- **Consequences:** Violations of this policy may result in disciplinary action, including termination of employment or contractual agreements.
- **Legal Action:** In cases of severe violations, ADAMftd may seek legal action against individuals or entities involved in bribery or corruption.

## Related Policies

This Anti-Bribery and Corruption Policy should be read in conjunction with our:

- Code of Conduct
- Supplier Code of Conduct
- Whistleblower Policy
- Anti-Slavery Policy
- CSR Policy

## Conclusion

ADAMftd Pte Ltd is committed to conducting business ethically and transparently. By adhering to this Anti-Bribery and Corruption Policy, we strive to maintain the trust and confidence of our stakeholders and contribute to a fair and just global business environment.

Signed,



James York  
Chief Executive Officer  
ADAMftd Pte Ltd  
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