



Loscam International Holdings Co., Limited

Anti-Bribery and Anti-Corruption Policy

Issued on 20 December 2024



Anti-Bribery and Anti-Corruption Policy

At Loscam International Holdings Co., Limited and its subsidiaries (collectively referred to as “Loscam”, “we” or “our”), in line with our “One Loscam – 5 Principles” to uphold integrity and honesty, offering our customers a reliable and ethical pooling solutions partner they rely on, we are committed to ethical, lawful, and transparent conduct in all business operations. We have established this Anti-Bribery and Anti-Corruption Policy (the “Policy”) to prevent, detect, and address bribery, corruption, and related misconduct. Breaches of this policy can lead to severe criminal, civil, and reputational consequences for both the company and individuals involved.

The Policy can thus be read in conjunction with Loscam’s various policies and procedures, including the Code of Conduct, Gifts and Hospitality Policy, Whistleblowing Policy, HR Policies & Procedures Manual, Policy of Conflict of Interest, among others. In any case, the more stringent provision will always apply.

APPLICABILITY

The Policy applies to all Loscam employees, directors, officers, consultants, contractors, agents, suppliers, and any third parties acting on our behalf. Compliance is expected from all individuals regardless of location, employment status, or organizational level.

The Policy may need to be modified in each market where Loscam operates when the extent of any local laws or legislations are more restrictive than the Policy.

KEY DEFINITIONS

Some of the most significant risks in terms of threats to our business are linked to:

1. Non-compliance with international trade agreements and international and local laws;
2. Damage to our reputation or relationship with our counterparties, including but not limited to customers, trading partners and suppliers; or
3. Loss of revenue due to trade sanction, regulatory infringement, criminal prosecution or loss of business.

In this regard, the way in which we undertake all aspects of our business must demonstrate our utmost effort to ensure our behaviours are not only professional but ethical according to the agreements and laws that regulate our business, wherever that is conducted.

The risk of bribery and corruption is a growing concern for both large and small companies which can be confronted with demands for bribes, faced with competitors acting corruptly or being undermined by employers violating their codes of conduct. The below definitions highlight key aspects of the terms of bribery, corruption and influence peddling:

- **Bribery**
Bribery is one form of corruption where a party acts – offering, giving, receiving, or soliciting something of value with the intention of influencing a public official or a participant in a private commercial transaction in the exercise of their duties in order to obtain or retain business, or an advantage or benefit that is not legitimately due to them. Local or industry custom or the low value of a benefit in comparison to the business or advantage, does not constitute a defense.
- **Corruption:**
The abuse of entrusted power for private gain, involving any activity that involves the abuse of position and power for an improper personal or business gain.

- **Influence Peddling:**

Using one's influence in government or connections with authorities to obtain favours or preferential treatment for another, often in exchange for payment or personal gain. It is a form of political corruption.

ZERO TOLERANCE FOR BRIBERY AND CORRUPTION

At Loscam we adopt a strict zero-tolerance approach toward bribery, corruption, and influence peddling. This includes offering, giving, receiving, or authorizing anything of value to secure business, influence decisions, or gain unfair advantages. This prohibition extends to all forms of value, including money, gifts, travel, donations, hospitality, contracts, or employment offers. We expect all business partners to align with the Policy and demonstrate similar zero-tolerance standards. Loscam does not and will not tolerate these types of behaviors by its management, employees or agents. Where possible, Loscam also seeks to discourage this behaviour within its customers, trading partners and suppliers.

OUR ROLE

On this basis, Loscam's managers and employees are expected to act with the utmost professionalism and honesty in carrying out their work - to provide guidance, we have established our internal Loscam Bribery and Corruption Control Framework. To support our employees, the Board and management of Loscam will strive to maintain a corporate culture that directs and encourages professional and ethical behaviour in all of our dealings.

Any employee of Loscam that engages in, encourages, tolerates or fails to act upon unethical or dishonest behaviour will face disciplinary action and where the behaviour is illegal, the matter will be referred to the police. Each employee and business partner is responsible for understanding, complying with, and upholding this policy. Employees must avoid any actions that could suggest bribery, corruption, or influence peddling and report any potential breaches.

Directors, management and employees should be well aware that if they are involved in an illegal act within the workplace, in addition to the potential to severely impact Loscam, they will be held personally liable under the applicable law and may face significant fines or imprisonment. Additionally, any money or other property determined to be derived from an illegal act is likely to be confiscated. At Loscam, crime will not pay regardless of the intentions of the parties involved.

Loscam has made a significant commitment to the development and implementation of our internal Bribery and Corruption Control Framework and all employees will receive relevant training as part of the induction process, with periodic updates to reinforce understanding and compliance.

OUR COMMITMENTS

Loscam reaffirms our unwavering commitment to ethical business practices. By eliminating bribery and corruption risks, we aim to uphold our reputation, foster trust, and ensure compliance with legal and ethical standards worldwide. As Loscam we have determined the following commitments:

1. Loscam prohibits all forms of bribery;
2. Loscam prohibits its employees from soliciting, arranging or accepting bribes intended for the employee's benefit, or family, friends, associates or acquaintances;
3. Loscam, its employees or agents, will not make direct or indirect contributions to political parties, organisations or individuals engaged in politics;
4. Loscam will endeavour to avoid making any political contributions, but if exist, we will publicly disclose them;
5. Loscam will ensure that charitable contributions and sponsorships are not a subterfuge for bribery;
6. Loscam will identify and eliminate facilitation payments that effect the awarding of new business or a decision to continue business with a particular party

(Note: some payments made to expedite a service to which the enterprise has a legal or other lawful entitlement and is considered “routine” may not be prohibited – however it is important that employees first consult either their respective country manager or the Chief Financial Officer or seek legal advice before making such payments);

7. Loscam prohibits the offer or receipt of gifts, hospitality or expenses whenever they could affect or be perceived to affect the outcome of business transactions; and
8. Loscam will keep rigorous records to ensure transparency and accountability and will implement strict internal controls.

TRAINING & AWARENESS

Loscam is committed to ensuring that all employees within the organization are aware of this Anti-Bribery and Anti-Corruption Policy. To achieve this, the Policy is made accessible to all employees, with specific briefings provided to new hires. Regular training sessions are conducted to educate employees about bribery and corruption risks, and the legal, regulatory, and ethical standards pertinent to their roles. Loscam offers periodic training programs on anti-bribery and anti-corruption compliance to reinforce awareness and understanding among employees. These sessions are mandatory for relevant staff and are designed to provide practical knowledge of legal and policy requirements. Loscam maintains records of employee participation to ensure compliance with training obligations.

RAISING CONCERNS

For general enquiry, it can be at any time emailed to esgproject@loscam.com, but for concern about any known or suspected violation of the Policy, please report it to whistleblow@loscam.com or through our whistleblowing platform - Loscam Integrity Line at <https://loscam.integrityline.com> in accordance with our Whistleblowing Policy.

POLICY REVIEW

Loscam will review and update this policy regularly to ensure its effectiveness. Internal controls and audit mechanisms will also be conducted to assess adherence and implement improvements. Feedback on the policy’s effectiveness is welcomed.

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