



# ASIA CAPITAL PLC

## Anti-Bribery and Corruption Policy



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### **1. Purpose:**

The purpose of this Anti-Bribery and Corruption Policy is to outline Asia Capital PLC commitment to conducting business ethically, with integrity, and in compliance with all applicable anti-bribery and corruption laws. This policy aims to prevent bribery and corruption in all aspects of the organization's operations.

### **2. Scope:**

This policy applies to all directors, officers, employees, consultants, contractors, vendors/suppliers and any third parties acting on behalf of Asia Capital PLC

### **3. Compliance with Laws:**

Asia Capital PLC is committed to complying with all applicable anti-bribery and corruption laws, including but not limited to the Commission to Investigate Allegations of Bribery or Corruption Act, No. 19, of 1994, and other relevant national and international laws.

### **4. Definition of Bribery and Corruption:**

**Bribery:**

Bribery is the offering, giving, receiving, or soliciting of anything of value, directly or indirectly, to influence the actions of an individual or entity.

**Corruption:**

Corruption involves the abuse of entrusted power for private gain, which may include bribery, embezzlement, fraud, or other unethical conduct.

### **5. Prohibited Conduct:**

**Bribery of Public Officials:**

No employee or representative of Asia Capital PLC shall offer, promise, give, request, or accept any bribe, kickback, or inappropriate payment/services to or from any government official, public servant, or any individual or entity acting on behalf of a public body.

*Commercial Bribery:*

Asia Capital PLC prohibits the offering, giving, receiving, or soliciting of bribes or corrupt payments/services in the private sector, including interactions with customers, suppliers, and business partners.



## **6. Facilitation Payments:**

Prohibition:

Facilitation payments/services, often referred to as "grease payments," are strictly prohibited. No employee shall make or authorize such payments/services.

## **7. Gifts, Hospitality, and Entertainment:**

Guidelines:

Asia Capital PLC recognizes that business relationships often involve the exchange of gifts, entertainment, and hospitality. While these practices are common and can contribute to relationship-building, it is crucial that they are conducted ethically and do not compromise the organization's commitment to anti-bribery and corruption principles.

All employees should exercise caution and good judgment when giving or receiving gifts, entertainment, or hospitality in a business context.

Gifts, entertainment, and hospitality should be reasonable, modest, and consistent with local customs and cultural norms.

No employee should offer or accept gifts, entertainment, or hospitality that could be perceived as an attempt to gain an improper business advantage.

Gifts:

Definition: A gift is any item, unofficial favor, or token of appreciation given or received in a business context. This includes, but is not limited to, merchandise, vouchers, or any other tangible or intangible items.

Acceptance Criteria:

Gifts of nominal value and promotional items are generally acceptable.

Employees should not accept cash or cash equivalents, as well as gifts that may create a sense of obligation.

Entertainment:

Definition: Entertainment includes activities such as meals, tickets to events, and other leisure activities provided or received in a business context.

Reasonable and Substantive:

Entertainment should be reasonable, substantive, and directly related to a legitimate business purpose.

Excessive or lavish entertainment that could be perceived as an attempt to influence business decisions is strictly prohibited.



### Hospitality during Business Meetings:

Hospitality provided during legitimate business meetings or events is generally acceptable, provided it is proportionate and in line with business norms.

#### Hospitality:

Definition: Hospitality involves the provision of accommodation, transportation, or other similar services in a business context.

#### Appropriateness:

Hospitality should be provided or accepted only when it is directly related to a legitimate business purpose.

It should be proportionate and in line with the level of the business relationship.

#### Avoiding Influence:

Hospitality should not be offered or accepted if it creates a situation where the giver or recipient may feel obligated to compromise business decisions.

#### Prohibition on Cash and Cash Equivalents:

Asia Capital PLC strictly prohibits the offering or acceptance of cash or cash equivalents, such as gift cards or vouchers that can be easily converted to cash.

### **8. Third-Party Due Diligence:**

#### Vetting of Business Partners:

Asia Capital PLC will conduct due diligence on third parties, including agents, intermediaries, and business partners, to ensure that they adhere to anti-bribery and corruption standards.

### **9. Reporting Suspected Violations:**

#### Whistleblower Protection:

Employees are encouraged to report any suspected violations of this policy through established reporting channels. Asia Capital PLC prohibits retaliation against individuals who make good-faith reports.

### **10. Consequences of Violations:**

#### Disciplinary Actions:

Violations of this policy may result in disciplinary actions, up to and including termination of employment or contractual relationships. Individuals may also be subject to civil or criminal prosecution.



## **11. Training and Communication:**

### **Training Programs:**

Asia Capital PLC will provide periodic anti-bribery and corruption training to all employees and relevant third parties to ensure awareness and understanding of this policy.

### **Communication:**

This policy will be communicated to all employees and third parties, and updates or changes will be promptly communicated.

## **12. Record-Keeping:**

### **Documentation:**

Asia Capital PLC will maintain accurate records of all transactions and dealings to demonstrate compliance with anti-bribery and corruption laws.

## **13. Review and Updates:**

### **Periodic Review:**

This policy will be subject to periodic reviews to ensure its continued relevance and effectiveness. Updates will be made as necessary to reflect changes in laws or organizational practices.

### **Asia Capital PLC Anti-Bribery and Corruption Policy Adoption:**

This policy was adopted by the Board of Directors on [Date].

[Signature of Board Chair] [Date]

[Signature of Managing Director] [Date]