



2. Anti-Corruption Compliance Policy

We are fully committed to ethical conduct, accountability, and the highest standards of corporate integrity.

This implies adhering to all laws and regulations applicable to GEP SING LTD, ensuring compliance across all jurisdictions where we operate. This includes, but is not limited to, adherence to legislation related to anti-corruption, anti-trust, anti-money laundering, anti-terrorism, and anti-slavery.



2.1. Anti-Bribery and Corruption ("ABC")

We never accept, ask for, engage in, make, offer, promise, tolerate or authorize any bribes, kickbacks or other questionable inducements to anyone, in any place, at any time.

We do not make or accept improper or facilitation payments to obtain or retain business or for any other purpose.

We exercise heightened diligence when interacting with Public Officials, including representatives of State-owned companies.

We do not engage with sales agents or equivalent intermediary agents.

We conduct business free from bribery and corruption in all its forms and we immediately report any indications or suspicions of bribery and corruption in all its forms.



2.2. Gifts, Hospitality, and Entertainment ("GHE")

We recognize that GHE can be a common form of courtesy which helps build business relationships. However, in some circumstances it may also become inappropriate, particularly when it is used to induce favorable treatment.

We only give or accept GHE that are legitimate, not lavish or disproportionate, moral, occasional and justifiable according to our internal processes and common practices.

We neither offer, promise, give nor accept, tolerate or authorize giving or accepting money or anything else of value to, or from any other party, directly or indirectly.

We are transparent about our actions relating to GHE and seek approval in line with internal processes where appropriate.

We do not give or accept GHE during a tender process.

Regardless of the value, we make a judgment call to determine if the GHE offered, given, accepted or received, create any obligation whatsoever, induce, or is perceived as inducing, the recipient to improperly perform their employment or official duties.



2.3. Donations and Sponsorships

We encourage and support donations and sponsorships that are legitimate, proportionate, and aligned with GEPSING LTD's objectives, enhancing our reputation and fostering good corporate citizenship in the communities and countries where we operate.

However, we do not make contributions to conceal payments intended to influence public officials or business decisions.

We do not make contributions in cash or to private accounts or to political parties.

We ensure that all donations and/or sponsorships are legitimate, sustainable, compliant with regulations and approved in line with internal processes.



2.4. Conflicts of Interest

We understand that conflicts of interest occur when an employee prioritizes personal interests over those of the company, allowing these interests to unduly influence business decisions or work-related actions.

perceived by others to improperly influence) our decisions in the workplace.

We recognize that conflicts of interest may arise from our personal relationships such as family or close connections, participation in external activities, or financial interests. These situations could improperly influence (or objectively be

We are committed to avoiding any conflict between the company's and our private interests. We do not let our private interests affect or influence our workplace decisions or engage in any behavior that could raise questions about our integrity or the integrity of the company.

We act with transparency, and we immediately report any existing or potential conflicts of interest.



2.5. Relationships with Third Parties

We proudly work with clients, partners, contractors, subcontractors and suppliers across the globe.

are trustworthy and adhere to values and standards compatible with ours. If so, we periodically monitor the relationship. If not, we do not engage with such third parties.

We conduct a risk-based approach due diligence before engaging with third parties to ensure they

We follow applicable due diligence procedures before engaging in a business relationship with third parties and continuously monitor them.



2.6. Fraud Prevention and Anti-Money Laundering

We do not engage in, tolerate or accept any behavior, including from our third parties, intended or be perceived to deceive or mislead others, obtain an unfair advantage, avoid an obligation or to facilitate illegal transactions of any kind.

We do not conceal, alter, destroy, or otherwise falsely modify company records, documents or entries or misapply company procedures.

We only process correct invoices for real, legitimate, and documented goods or services to approved bank accounts of known parties based on contractual obligations.