

# Anti-Bribery and Anti-Corruption Policy

<b>Effective Date</b>	01 <sup>ST</sup> JANUARY 2023
<b>Responsible Position</b>	General Manager
<b>Policy Applies to</b>	All KutMor Business Groups, Functions and Subsidiaries
<b>Exclusions</b>	NONE

## Policy Statement

KutMor strives to establish a reputation of being a reliable and professional service delivery organisation. Bribery and corruption are not only against our company values; they are illegal and can expose both the employee and the company to fines and penalties, including imprisonment and reputational damage. KutMor is therefore committed to operating in accordance with the highest ethical standards and prohibits all forms of bribery and corruption.

## Purpose

The purpose of this policy is to:

- Ensure that KutMor Business Groups, Functions and Subsidiaries conduct company business in an ethical manner and understand and adhere to the requirements of all applicable anti-bribery and anti-corruption laws and best practices.
- Set out the responsibilities of KutMor and all individuals who work for KutMor, in observing and upholding the company's position on bribery and corruption.
- Provide information and guidance necessary to those individuals working for KutMor on how to recognize and deal with bribery and corruption risks.

## Guideline and Principles

The Anti-bribery and Anti-corruption Process, Procedures and Tools are documented in the Human Resource Manual. The procedures described in the manual have been developed based on KutMor's Vision, Core Values, Behaviours, Code of Conduct, and the requirement to achieve the highest possible level of ethical business behaviour.

## Accountability and Responsibility

Adherence to this Policy and associated procedures is mandatory. The Human Resource Function is accountable for the implementation and monitoring of this Policy with Line Managers responsible for compliance.

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*Approved on behalf of the KutMor Board of Directors*

**Chairperson – Board of Directors**

**Sakai Kei**

**Independent Director**

**Glenn Darnley-Stuart**