



## **Abundance International Limited**

(the "Company" or "We")  
(Company Registration No.: 197501572K)  
(Incorporated in Singapore)

# **ANTI-CORRUPTION POLICY**

### **Policy objective**

The Company adopts a zero-tolerance approach to bribery and corruption of any form as set out in the Code of Conduct and reflected in this Anti-Corruption Policy.

We must at all times comply with the Anti-Corruption Policy and all relevant anti-bribery and corruption laws including the Singapore Prevention of Corruption Act and other similar anti-bribery laws where we do business.

### **Scope**

This policy applies to the Company and its subsidiaries ("**the Group**").

### **Procedures**

You are expected to use good judgment at all times, and to refrain from making or accepting any payment or gesture that may be considered a bribe - even if a particular scenario is not specifically addressed below.

- **Gifts and hospitality**

It is the responsibility of the person extending or receiving such a gift and hospitality to ensure that it is not a bribe and is in strict compliance with the Company's Code of Conduct – Gifts and Hospitality.

- **Charitable contributions**

You must not use charitable contributions as a way of concealing a bribe.

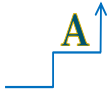
- **Sponsorships**

The provision of sponsorships should be in strict compliance with the relevant company guidelines.

- **Unusual billing activities**

You must be alert to unusual billing activities that might indicate the use of funds to pay illicit bribes or kickbacks. If you detect any unusual or suspicious billing activity, you must promptly ask for clarification and supporting documentation. If you do not receive a sufficient explanation for the activity, do not authorise any payments and promptly notify your manager or contact the Managing Director for further guidance.

Examples of red flags to be aware of include:



- Unusual discounts, rebates, or refunds to business partners or customers
- Excessive commissions paid to partners, consultants, or sales agents, who may then use the excess to pay bribes or kickbacks
- Unsubstantiated invoices from a vendor – do not authorize any payment until you have proof that the services or products were actually provided
- Invoices from an unfamiliar vendor – before you authorize any payment, verify the business justification for engaging the vendor, that the vendor has appropriate experience and expertise for the job
- Vague descriptions of fees – be suspicious of any invoice that contains vague descriptions of fees (such as “miscellaneous fees” or “administrative fees”) or catch-all descriptions (such as “marketing event, \$25,000”) and verify each line item before you authorize any payment.

The Company’s employee who performs certain business functions (such as senior management, sales, accounting, finance, and procurement) may participate in anti-corruption training on a periodic basis. The Managing Director will identify the appropriate employees and administering the training to them. If you receive a notice to complete anti-corruption training, you must complete it before the due date specified in the notice.

### **How to Report**

You may report any suspected violations of this Policy to the Designated Officer at [contact@abundance.com.sg](mailto:contact@abundance.com.sg) or Audit Committee or the Company in accordance with the Company’s Whistle Blowing Policy.

If you have inadvertently or unintentionally become involved in a corrupt situation, extricate yourselves from the situation as soon as you become aware of the corrupt element (by firmly refusing to pay or to accept the bribe or to participate in or condone the act of bribery) and immediately inform your immediate supervisors or senior management.

### **Violation**

Failure to comply with this Policy will be grounds for disciplinary action, including termination of employment or affiliation with the Company. Individuals who violate anti-corruption laws may also be formally prosecuted and subject to administrative, civil, or criminal penalties, including monetary fines or imprisonment.

### **Monitor and Review**

The policy will be regularly reviewed and updated as needed to ensure it continues to be adequate and effective.

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