

ANTI-CORRUPTION COMPLIANCE AND DECLARATION DOCUMENT

Company: PIPING SYSTEM PTE. LTD.

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Effective Date: 27 October 2023

Version: 1.0

1.0 POLICY STATEMENT AND PURPOSE

1.1 Statement of Commitment

PIPING SYSTEM PTE. LTD. (the "Company") is committed to conducting its business with the highest degree of integrity, ethics, and transparency. The Company has a strict **zero-tolerance policy** towards all forms of bribery and corruption. We are committed to acting professionally, fairly, and in compliance with all applicable anti-corruption laws and regulations in all countries where we operate.

1.2 Purpose

The purpose of this document is to:

- Provide clear guidelines to prevent bribery and corruption.
- Ensure compliance with relevant laws, including but not limited to the Singapore Prevention of Corruption Act, the UK Bribery Act 2010, and the US Foreign Corrupt Practices Act (FCPA).
- Outline the responsibilities of all Individuals covered by this policy.
- Establish a framework for reporting concerns.

1.3 Scope

This policy applies to all employees, directors, officers, interns, and agents of PIPING SYSTEM PTE. LTD., and its subsidiaries worldwide (collectively referred to as "Covered Individuals"). It also extends to all third parties acting on the Company's behalf, such as consultants, agents, distributors, joint venture partners, and suppliers.

2.0 PROHIBITED CONDUCT

2.1 General Prohibition

Covered Individuals are strictly prohibited from offering, giving, promising, soliciting, or accepting any form of **Bribe** or **Undue Advantage**, whether directly or indirectly, to or from any person to gain any commercial, contractual, regulatory, or personal advantage.

2.2 Definition of a Bribe

A "Bribe" is defined as any financial or other advantage offered, promised, or given with the intention of influencing a person to act improperly or to reward them for doing so. This includes, but is not limited to:

- Cash or cash equivalents.
- Gifts, hospitality, or entertainment.
- Kickbacks, commissions, or facilitation payments.
- Favors, such as employment opportunities for a relative.

2.3 Public Officials

Special care must be taken when dealing with **Public Officials** (any government official, employee of a state-owned enterprise, political party official, or candidate for public office). Offering anything of value to a Public Official is strictly prohibited, unless it is a token gesture of courtesy compliant with local law and of minimal value (e.g., a company-branded pen).

3.0 KEY AREAS & PROCEDURAL GUIDELINES

3.1 Gifts, Hospitality, and Expenses

Principle: Gifts and hospitality must be **reasonable, proportionate**, and made in good faith. They must not be intended to influence a business decision or create a sense of obligation.

Approval: Any gift, meal, or entertainment exceeding a value of [e.g., USD 100] per instance requires prior written approval from the employee's manager and the Compliance Officer. All expenses must be accurately recorded with a legitimate business purpose.

3.2 Facilitation Payments

Facilitation payments (small, unofficial payments made to secure or expedite a routine government action) are prohibited, even in locations where they are common practice. Employees must refuse to make such payments and should report any request for one to the Compliance Officer.

3.3 Donations and Sponsorships

The Company prohibits charitable donations and sponsorships that are, or could be perceived as, a means of concealing a bribe. All corporate donations must be transparent, made to legitimate organizations, and receive prior approval from the Board of Directors.

3.4 Conflicts of Interest

Covered Individuals must avoid situations where their personal interests could conflict, or appear to conflict, with the interests of the Company. Any actual or potential conflict of interest must be disclosed immediately to the Compliance Officer.

3.5 Accurate Books and Records

All business transactions must be accurately and fairly recorded in the Company's

financial books. The use of "off-the-books" accounts or falsified documentation is strictly prohibited.

3.6 Third-Party Due Diligence

The Company will conduct appropriate risk-based due diligence on all third-party agents, consultants, and partners before engagement. Contracts with third parties must include anti-corruption clauses and warranties of compliance with this policy.

4.0 ROLES, RESPONSIBILITIES & REPORTING

4.1 Responsibilities of Covered Individuals

All Covered Individuals are required to:

- Read, understand, and comply with this policy.
- Complete all mandatory anti-corruption training.
- Be vigilant to corruption risks.
- Report any suspicions or breaches of this policy immediately.

4.2 Compliance Officer

The Company has designated a Compliance Officer who is responsible for implementing this policy, providing guidance, monitoring compliance, and investigating reports.

4.3 Reporting Channels (Speak-Up Policy)

The Company encourages everyone to report any concerns in good faith without fear of retaliation. Reports can be made:

- To your direct Line Manager.
- To the Human Resources Department.
- To the Compliance Officer.
- Via the **Confidential Reporting Channel**: compliance@piping.cn.

4.4 Non-Retaliation

The Company prohibits retaliation of any kind against individuals who report concerns in good faith. Any act of retaliation will be treated as a serious disciplinary offense.

5.0 BREACHES AND DISCIPLINARY ACTION

Failure to comply with this policy will result in disciplinary action, up to and including summary dismissal. It may also lead to criminal or civil penalties for the individual and the Company.

DECLARATION OF UNDERSTANDING AND COMPLIANCE

I, the undersigned, acknowledge that I have received, read, and understood the PIPING SYSTEM PTE. LTD. Anti-Corruption Compliance and Declaration Document (Version 1.0).

I agree to abide by the terms of this policy and all applicable anti-corruption laws in the performance of my duties. I understand that any violation of this policy may result in disciplinary action, including termination of employment, and potential legal consequences.

I confirm that I have disclosed to the Compliance Officer any known situations that could constitute an actual or potential conflict of interest. I undertake to disclose any such situations that may arise in the future.

Printed Name: _____

Signature: _____

Position/Title: _____

Department: _____

Date: _____

(For Company Records)

Compliance Officer's Note:

Policy reviewed with the employee during onboarding.

Annual refresher training provided.

Questions addressed satisfactorily.

Compliance Officer's Signature: _____ **Date:** _____