

Anti-Corruption Policy

1. PURPOSE

The purpose of this Anti-Corruption Policy is to ensure that SRF ALTECH Ltd. conducts all business activities with the highest standards of integrity and transparency, and actively works against Corruption in all its forms, including Bribery, Extortion, Embezzlement, Facilitation Payments, and Money Laundering, consistent with Applicable Laws and prevailing international standards, including:

- ASI Performance Standard V3 – Criterion 1.2 Anti-Corruption
- Transparency International Business Principles
- ICC Rules on Combatting Corruption
- UN Global Compact Principles
- ISO 37001 Anti-Bribery Management System Framework

This policy supports the protection of Human Rights, environmental stewardship, fair labour practices, and the rule of law.

2. SCOPE

This policy applies to all:

- Employees, workers, directors, and officers
- Contractors and suppliers
- Intermediaries, agents, consultants, or representatives
- Any third party acting on behalf of SRF ALTECH
- All SRF ALTECH Facilities and business units, including overseas operations

It covers all interactions with:

- Government officials
- Customers and suppliers
- Public institutions
- Communities and stakeholders
- Any external entity where corruption risk may arise

3. POLICY STATEMENT & CORE PRINCIPLES

3.1 Zero Tolerance

SRF ALTECH adopts a zero-tolerance approach toward any form of Corruption.

3.2 Transparency

All financial transactions and business decisions must be recorded accurately, traceably, and transparently.

3.3 Accountability

All personnel and third parties are accountable for complying with this policy and relevant laws.

3.4 Protection for Employees

Consistent with ASI 1.2, employees are protected from punishment, demotion, or retaliation if they:

- Refuse to participate in corrupt practices
- Report corruption concerns in good faith
- Decline to engage even if such refusal may result in business loss

4. PROHIBITED PRACTICES (ASI-ALIGNED)

The following are strictly prohibited:

4.1 Bribery

Offering, giving, receiving, or soliciting anything of value—including cash, gifts, hospitality, discounts, or favours—to improperly influence a decision.

4.2 Extortion

Demanding undue advantage or forcing someone to provide a bribe.

4.3 Facilitation Payments

Small unofficial payments to secure or expedite routine government actions.

4.4 Embezzlement

Misappropriation of company, community, or project funds.

4.5 Money Laundering

Transferring illegal funds to disguise their origin.

4.6 Conflicts of Interest

Undisclosed personal interests influencing business decisions.

4.7 Political or Charitable Contributions for Influence

No political donations or sponsorships may be made to gain advantage.

5. CONTROL MEASURES & SYSTEMS (ASI REQUIREMENTS)

5.1 Anti-Corruption Management System

SRF ALTECH will maintain policies, procedures, and internal controls to:

- Prevent, detect, and respond to corruption
- Verify legitimacy of all cash transactions
- Limit cash transactions to regulatory maximums or US\$10,000 if no local limit applies
- Require pre-approval for high-risk payments

5.2 Gift, Hospitality & Entertainment Controls

- Only token gifts of nominal value may be accepted/offered.
- A Third-Party Gift Register shall record all gifts given or received.
- **All significant hospitality must be pre-approved and documented.**

5.3 Contractual Controls

All supplier and contractor agreements must:

- Include anti-corruption clauses
- Require adherence to this policy
- Allow SRF ALTECH to terminate contracts for violations

6. TRAINING & AWARENESS (ASI-ALIGNED)

SRF ALTECH shall implement:

- Mandatory annual anti-corruption training for all workers
- Additional targeted training for high-risk roles (procurement, logistics, sales, government interface)
- Regular communication on compliance expectations and red flags

7. RISK ASSESSMENT & MONITORING

7.1 Corruption Risk Assessments

SRF ALTECH shall periodically conduct corruption risk assessments considering:

- High-risk countries (based on Transparency International CPI, TRACE Matrix)
- Government-related transactions
- Procurement and contracting
- Cash-intensive processes
- Use of intermediaries or agents

7.2 Anti-Corruption Program Controls

Controls will include:

- Documented approval workflows
- Segregation of duties
- Background checks for agents and key suppliers
- Enhanced oversight of high-risk transactions
- Investigation of attempted bribery cases

7.3 Internal Audits

At least two internal anti-corruption audits per year will be conducted to assess compliance.

8. THIRD-PARTY DUE DILIGENCE

SRF ALTECH will conduct due diligence on:

- Suppliers
- Contractors
- Intermediaries
- Service providers
- Community-facing partners

Due diligence must include:

- Screening for corruption or sanctions history
- Reviewing ownership and governance
- Corruption risk scoring
- Signed acknowledgment of the Anti-Corruption Policy

9. REPORTING, WHISTLEBLOWING & PROTECTION

9.1 Reporting Channels

Any employee or stakeholder may report concerns via:

- Whistleblowing hotline
- Email to Compliance Officer
- Anonymous drop-box
- Third-party reporting platform

9.2 Non-Retaliation Commitment

No person reporting in good faith will face:

- Retaliation
- Harassment
- Demotion
- Disciplinary action

This protection is compliant with ASI Criterion 1.2.

10. RESPONSE TO VIOLATIONS

10.1 Investigation

All reports will be:

- Treated confidentially
- Investigated promptly and fairly
- Managed by competent personnel with no conflict of interest

10.2 Disciplinary Actions

Violations may result in:

- Termination of employment
- Termination of contracts
- Legal action
- Recovery of financial loss

10.3 Corrective Actions

SRF ALTECH will address system weaknesses and improve controls after any incident.

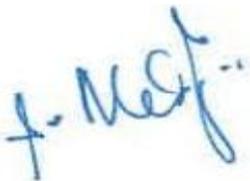
11. GOVERNANCE & RESPONSIBILITIES

Role	Key Responsibilities
Board of Directors	Endorses policy; oversees integrity systems.
Senior Management	Implement controls; conducts risk assessments; reinforces ethical culture.
Compliance Officer	Manages anti-corruption program, audits, investigations, training.
Supervisors	Ensure team compliance and escalate concerns.
Employees	Comply fully; avoid conflicts; report corruption.
Third Parties	Sign policy; cooperate in audits; maintain anti-corruption standards.

12. REVIEW & CONTINUAL IMPROVEMENT

- This policy will be reviewed annually, or earlier if:
 - Significant operational changes occur
 - Laws or standards change
 - Corruption risks increase
 - Mergers or acquisitions occur
- Revisions will be documented in the Revision History Log

Approved By,



Site Head, SRF Altech Limited.