

Anti-Corruption and Anti-Bribery Policy

POLICY STATEMENT:

Radiant Cash Management Services Ltd (“RCMS”) core value is to uphold responsible and fair business practices. It is committed to promoting and maintaining the highest level of ethical standards in relation to all of its business activities. Its reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve these values. The Company therefore has a zero tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all of its business dealings and relationships and implementing and enforcing effective systems to counter bribery.

Bribery offences can result in legal action including the imposition of severe fines and/or custodial sentences (imprisonment), exclusion from tendering for public contracts, and severe reputational damage.

We therefore take our legal responsibilities very seriously. We will uphold all laws relevant to countering bribery and corruption.

OBJECTIVE

The purpose of this policy is to:

- i. set out our responsibilities to comply with laws against bribery and corruption; and
- ii. provide guidance on how to recognise and deal with bribery and corruption issues

APPLICABILITY

This Policy is applicable to all individuals working at all levels and grades, including directors, senior managers, officers, other employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, interns, seconded staff, casual workers and agency staff, agents, or any other person associated with our Company and such other persons, including those acting on behalf of our Company

DEFINITIONS

- i. **Bribery** means to obtain or accept or attempt to obtain or promise for giving, receiving, soliciting or accepting of financial or other advantages, or any other thing of value, to influence or reward the behaviour of a person who is in a position of trust to perform a public, commercial or legal function to retain or obtain a commercial advantage. Bribes are payments made in the form of money or anything else of value in return for a business favour or advantage.
- ii. **Corruption** includes wrongdoing on the part of an authority, or those in power, through means that are illegitimate, immoral, or incompatible with ethical standards. It is usually designed to obtain financial benefits or other personal gain. For example, bribes offered or promised in the

RADIANT CASH MANAGEMENT SERVICES LIMITED

form of money, a privilege, an object of value, an advantage to exert improper influence on decisions of an individual in his official capacity.

- iii. **Facilitation** payments are unofficial payments made to secure or expedite a routine action by authorized official.
- iv. **Kickbacks** are payments made in return for a business favor/advantage.
- v. **Gift** means any item of considerable value, given to/received from a party that has business dealings with the organization.

The most prevalent forms of bribery and corruption stem from:

- Payments to a company's employees or their relatives, or to a third party, to secure advantage in business transactions.
- Political contributions made to secure advantage in business transactions.
- Sponsorships used to secure advantage in business transactions.
- Facilitation payments made to secure or accelerate routine or necessary business actions.
- Gifts, hospitality and expenses payments made to secure advantage in business transactions.

RESPONSIBILITIES

a. **Audit Committee / Board of Directors:**

- i. The Audit Committee/ Board of Directors of the Company ("Board") shall have oversight of governance and compliance with this Policy. Aggravated cases of breach of this Policy shall be escalated to the Audit Committee or Board.
- ii. The Audit Committee or Board will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy and effectiveness

b. **Managing Director / Authorised Senior Management Personnel:**

- i. The Managing Director or a Senior Management Personnel authorised by the Managing Director shall, from time to time, review compliance with the provisions of this Policy and the same shall be reported to the Managing Director for appropriate modification / updation required in this policy
- ii. Under the directions of Managing Director, regular and relevant on-going training and awareness sessions shall be made available to persons to which this policy is applicable.
- iii. Any query, concerns or complaint received by any Personnel regarding bribery or corruption issue should be promptly reported to the Managing Director / Authorised Senior Management Personnel.

RADIANT CASH MANAGEMENT SERVICES LIMITED

- iv. Every query or concern raised in relation to any suspected violation of this Policy shall be reviewed/investigated by the Managing Director or a Senior Management Personnel authorised by the Managing Director. Any disciplinary action required to be undertaken shall be taken by the Managing Director in accordance with this Policy.
- c. Employees and Associated Personnel:**
- i. All Employees and Associated Personnel should familiarise themselves with this Policy and are urged to participate in training sessions made available or guidelines issued by the Company from time to time.
 - ii. Personnel who are in managerial positions shall ensure that their team members are familiar with this Policy and other related policies herein. They shall guide and ensure that the guidelines in this Policy are upheld and adhered to by their team members and the third parties working with them
 - iii. It will be the duty of persons holding managerial positions, to report any non-compliance noted so that necessary action can be taken by the Company promptly to mitigate the risks and other consequences arising therefrom.
 - iv. All Employees and Associated Personnel shall provide full cooperation for any enquiry or investigation conducted or to be conducted by the Company for potential violation of this Policy.
 - v. Ensure compliance with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the state in which they might be expected to conduct business.
 - vi. Act honestly, responsibly and with integrity
 - vii. Safeguard and uphold the Company's core values by operating in an ethical, professional and lawful manner at all times.
 - viii. Employees and Associated Personnel shall not directly or indirectly:
 - a. Accept to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
 - b. Give, promise to give or offer, any payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
 - c. Accept or solicit any payment, advantage, gift or hospitality from a Third Party that you are familiar, with the expectation that it will obtain a business advantage for them
 - d. Threaten or retaliate against, another employee who has refused to commit a bribery offence or who has raised concerns under this Policy
 - e. Engage in any activity that might lead to a breach of this Policy

RADIANT CASH MANAGEMENT SERVICES LIMITED

NON APPLICABILITY

- i. This policy does not prohibit normal business hospitality, so long as it is reasonable, appropriate, modest, and bona fide corporate hospitality, and if its purpose is to improve our company image, present our products and services, or establish cordial relations.
- ii. Any expenses that an employee or third party incurs on RCMS behalf or in connection with our business which are lawful and supported by detailed documentation including, for example, valid invoices or receipts.
- iii. In some cultures/ countries, it may be seen as an insult to reject a gift, and refusals may adversely affect business relationships. In these circumstances, and if the gift is anything other than moderate, the gift should be reported to the reporting manager who will decide whether such gift will be retained or returned. If your reporting manager is uncertain how to treat the gift, he/she should seek clarification from his/her relevant Human Resource (HR) contact.

DISPLAY & COMMUNICATION OF POLICY

- f. The Policy shall be displayed to all employees through the website of the Company or through employee portal of RCMS
- g. Any changes in the Policy shall be notified through the employee portal by way of updated Policy document.
- h. Policy Awareness shall be conducted regularly through various discussion / communication forums.

PERIODIC REVIEW AND EVALUATION

- i. The Audit Committee or the Board will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy and effectiveness.
- ii. RCMS reserves the right to vary and/or amend the terms of this Policy from time to time.