



Integrity & Ethics Policy

Asia Pacific Rayon (APR) is committed to sustainable development and upholds our business philosophy of doing what is “Good for the Country, Good for the Community, Good for the Climate, Good for the Customer, and Good for the Company”. APR is also aware of its corporate responsibility and supports the actions being taken to create sustainable corporate integrity as such our conduct is governed by RGE’s Code of Conduct and Code of Procurement Ethics.

This policy sets out APR’s approach to unacceptable business practices, including bribery and corruption. It requires compliance with all applicable laws and regulations on bribery and corruption where APR operates, and other applicable national anti-bribery statutes and implementing rules and regulations including the relevant standards set out in the United Nations Convention Against Corruption.

All APR employees and any person who performs services and/or acts for and on behalf of APR, including contractors, suppliers, consultants, agency staff and business partners (“Persons associated with APR”) are required to adhere to this policy, irrespective of the jurisdiction they operate in and the laws applicable to such jurisdiction (where this policy represents a higher standard). Non-compliance may result in disciplinary action being taken which may lead to termination of employment, and/or to the termination of a third party contract (as the case may be). We will endeavor to make third parties specifically aware about the significance to APR of the policy and shall be encouraged to apply the same policy or a similar standard.

The policy refers to all kinds of corrupt practices and key areas of risk that are likely to arise, including but not limited to:

- Active bribery – the giving, promising or offering of a bribe;
- Passive bribery – the requesting, agreeing to receive or accepting of a bribe;
- The bribing of any public or Government official; and
- Illicit enrichment – misuse of company assets, funds or personnel for any unlawful, improper, or unethical purpose.
- Facilitation of tax evasion – deliberately and dishonestly taking action to facilitate tax evasion.
- Facilitation payments
- Charitable donations and sponsorship

The RGE Global Code of Conduct provides additional details on following corruption risks - Conflicts of interest, Gifts and hospitality, Political donations, Interactions with Government officials and lobbying.

Our Company and employees, embrace our corporate responsibility to conducting business ethically and with the utmost integrity, transparency and honesty across our operations and commit to:

- Improve our processes continuously to prevent direct or indirect bribery, in order to safeguard and uphold our values.
- Observe the anti-bribery and anti-corruption legislations and regulations in the countries where we have business activities in and undertake ourselves to not engage in any corrupt or improper practices.
- Strive to ensure that our business partners and suppliers share our zero- tolerance policy against corruption and bribery.
- Avoid engaging in business dealings with those known or reasonably suspected to be engaging in corruption and bribery.
- Not tolerate any form of bribery or corruption in our business and will neither give nor accept bribes, such as making “facilitating or grease payments”, nor permit others acting on our behalf to do so.
- Uphold ethical and professional business practices.
- Not use our position for personal gain.
- Regularly discuss the importance of ethically and legally sound business practices.
- Adopt zero tolerance for retaliation against anyone who raises concerns.

As set out in RGE’s Code of Conduct, employees will not, on behalf of a APR, make use of corporate resources, including funds, goods, property, and/or services, for the purpose of contributing to: a political party; a campaign for elected office; a nomination process for a political party; a local political constituency; and/or any individual seeking election at any level of government in any jurisdiction. Employees may not:

- Offer or give or promise anything of value to a government official with the intent to obtain or retain any business

or any other advantage.

- Pay for any business entertainment, travel expenses or give any gifts to government officials unless they follow the Company's Gift/Entertainment Guidelines, or receive prior approval to confirm legitimacy and reasonableness of the expenses.
- Do business with a government official until sufficient due diligence has been performed to enable APR to conclude with reasonable assurance that the consultant, agent, or intermediary understands and will fully abide by applicable Anti-Corruption Laws and this Policy.
- Make any payments to government officials, including low-level government employees, to expedite or secure performance of a routine governmental action (sometimes referred to as "facilitation payments").

Employees are required to:

- Make accurate and complete entries in APR books and records and follow APR's accounting procedures and internal controls.
- Have a written agreement with each of these consultants, agents and intermediaries which contains language confirming such party's binding agreement to comply with the APR Anti-Corruption Policy.

All employees are to receive training on this policy at induction and are encouraged to raise any genuine concern about a suspected breach of this policy or any perceived infringement of their rights. Should there be reason to suspect non-compliance with this policy, employees have a duty to raise a concern.

Reporting violations

All employees are encouraged to raise any genuine concern about suspected misconduct or malpractice, including bribery, facilitation payments, extortion and money laundering, tax evasion, ethical misconduct or any perceived infringement of their rights. Known breaches of this policy must be reported through available channels such as Whistleblowing or Grievance Mechanism.

Sanctions

Violations of this policy will not be tolerated. While violations will be reviewed on a case by case basis, should any instances of bribery, corruption or other misconduct under this policy be identified, appropriate steps will be taken immediately. This may include a review and revision of the business relationship, legal claims or disciplinary action in accordance with the disciplinary procedures. Such disciplinary action may lead to termination of employment. Disciplinary action may also be instigated for instances of a failure to report a known violation of this policy. Appropriate action will also be taken vis-a-vis counterparties involved in any breach of this policy, including with regard to contracts concluded with such parties. This may result in the termination of a third party contract.

Monitoring and review

This policy will be enforced through regular monitoring and review and will form part of the Group Internal Audit procedures to periodically assess its effectiveness. Progress on APR's commitments to ethical conduct and prohibition of corruption will be reported in the Sustainability Report.



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