

## **Kingfa Science & Technology (India) Limited**

### **Bribery /Anti-Corruption Policy**

This Bribery Policy (the "Policy") applies to Kingfa Science & Technology (India) Limited ("Kingfa India") and supports the principles of the Kingfa Code of conduct in relation to business ethics and anti-corruption.

Kingfa India is committed to ensuring that no bribes, kickbacks or similar gifts, payments or advantages are solicited from or given to any person, whether in the public or private sector, for any purpose. This Policy is intended for the following purposes:

- to assist employees to recognise circumstances which may give the appearance of corruption or unethical business conduct;
- to avoid conduct which is clearly prohibited; and
- to encourage employees to promptly seek guidance where it is not.

Bribery normally involves paying or offering money, or something else of value, to obtain or keep an improper advantage, or to induce or reward someone for acting improperly. Someone acts improperly if they act in a way they are not supposed to, for example an employee acting in breach of duties he owes to his employer or a public official acting for his own personal benefit rather than in the public interest. A gift or other advantage would also be improper if you believe that the recipient would not be allowed to accept it, whether as a matter of law or because of the rules of his/her employer's organisation. Bribes often involve payments (or promises of payments) but may also include providing lavish/inappropriate gifts and hospitality or other significant favours. Bribery includes advantages provided directly, as well as indirectly through an intermediary.

#### **ETHICAL CONDUCT REQUIREMENTS EMPLOYEES OF KINGFA INDIA**

1. The Kingfa India requires all Kingfa employees to comply fully with all applicable laws and regulations in the territories where we conduct business, and to adhere to high standards of ethical conduct.
2. Employees and other representatives of Kingfa India are therefore strictly prohibited from:
  - 2.1 offering, promising, giving or authorising, directly or indirectly, any bribe or kickback to or for the benefit of any person (whether in the public or private sector) in order to obtain or keep any improper business or other advantage for Kingfa India, for themselves, or for their family, friends, associates or acquaintances, or otherwise using improper means to influence the actions of others;

2.2 soliciting, accepting or receiving (whether for Kingfa India benefit, their own benefit or that of their family, friends, associates or acquaintances) any bribe or kickback from any person (whether in the public or private sector); or

2.3 acting as an intermediary for a third party in the solicitation, acceptance, payment or offer of a bribe or kickback.

3. In addition, Kingfa India will not approve or be party to payments or gifts if a third party could reasonably perceive that they have been made to win or retain business improperly, or to improperly influence a business decision. If in doubt, consider whether you would be embarrassed if your colleagues or anyone outside Kingfa India became aware of what you are proposing to do.
4. As well as complying with the specific prohibitions in this Policy, Employees are required to exercise common sense and judgment in assessing whether any arrangement could be perceived to be corrupt or otherwise inappropriate. Any questions in relation to particular arrangements or payments should be informed to Company.
5. Improperly influencing people by providing them with inappropriate gifts or hospitality is likely to be illegal and may result in civil and criminal penalties.
6. Kingfa India may interact with government agencies in a number of roles, including: as shareholders, as regulators, as customers, as suppliers or as policymakers. In most countries, giving gifts and donations to government functionaries and agencies is illegal, and attracts civil as well as criminal penalties. Therefore, employees must take additional precautions when dealing with government functionaries and agencies in any capacity.

For Kingfa Science & Technology(India) Limited

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Managing Director