

## **Hiwire Data & Security Pte Ltd – Anti-Bribery and Anti-Corruption Policy**

Hiwire is committed to conduct our businesses and operations in an honest and ethical manner. We adopt a zero-tolerance approach to bribery and corruption and are committed to acting professionally, transparently and fairly with integrity in all our business dealings and relationships as well as implementing and enforcing effective systems to counter bribery and corruption.

**We have an updated database of anti-money laundering that any company can subscribe from us.**

This Policy sets out the minimum standard that must be followed. Where local laws, regulations or rules impose a higher standard, that higher standard must be followed.

This Policy applies to all employees (full and part-time), contract workers, consultants, officers and directors as well as people acting on our behalf.

### **GENERAL PRINCIPLES**

#### **What is prohibited?**

Persons may not, directly or indirectly, (i) offer, (ii) promise, (iii) agree to pay, (iv) authorise payment of, (v) pay, (vi) give, (vii) accept, or (viii) solicit Anything of Value to or from any third party in order to secure or reward an improper benefit or improper performance of a function, activity or to procure an unfair business advantage. Prohibited payments, offers or receipts are not permitted at all times, whether or not they are given to or received from a Government Official or to any person in a private enterprise, business or entity, and regardless of whether they are given or received directly or indirectly by another person or entity on behalf of the Company.

#### **What type of conduct is prohibited?**

An act prohibited under Section 2.1 does not actually have to take place. We should avoid any conduct that creates even the appearance of improper activity or conduct.

#### **What are the consequences of violations?**

Violations can have severe consequences for the Company and the individual involved, and can attract both criminal and civil penalties. As an example, under the Prevention of Corruption Act of Singapore ("PCA"), a conviction for a corruption offence is punishable by fines of up to S\$100,000 or an imprisonment term of up to seven (7) years or both. In addition, if the Company is found to have taken part in corrupt activities, we will be excluded from tendering for public contracts. This will have severe repercussions and damage to both our reputation and financial performance.

### **ANTI-BRIBERY AND ANTI-CORRUPTION LAWS**

#### **Applicable laws**

We will uphold all laws relevant to counter bribery and corruption in all the jurisdictions in which we operate. For our businesses and operations in Singapore, we are bound to observe all relevant and applicable laws which include but are not limited to the PCA, the Penal Code and The Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) Act which may be relevant to the corrupt receipt of gifts and hospitality.

#### **Criminal liability**

The application of all these laws means that any Person may be subject to criminal liability if he/she directly or indirectly, offers or pays, or authorises the payment of or accepts Anything of Value in exchange for some improper advantage for the Company. Such acts extend not only to improper

direct cash payments but also to the improper provision or receipt of gifts, hospitality, employment and charitable donations.

In addition, under the relevant laws in the jurisdictions where the Group has operations in, it is a crime to engage in acts such as those discussed in Section 3.3.1 regardless of whether those acts involve Government Officials or private persons in any business relationship.

Consultants, representatives, agents, and intermediaries ("Third Parties")

It is also common in many jurisdictions that the improper acts of Third Parties can create criminal liability for the entities for which those Third Parties work. As such, it is necessary to ensure that all Third Parties that are engaged for the provision and/or supply of goods and services uphold the principles that are stated in this Policy.

We may terminate its relationship with any Third Parties that deviate from our anti-corruption standards and expectations. Persons who deal with Third Parties are responsible for taking reasonable precautions to ensure that the Third Parties conduct business ethically, are aware of our zero-tolerance approach to bribery and corruption and comply with anti-corruption laws. On a risk-sensitive basis (i.e. proportionate to the level of risk of bribery), an entity must conduct an appropriate level of due diligence before engaging, hiring or contracting with Third Parties. Due diligence involves the investigation and evaluation of prospective Third Parties by way of background checks and research to assess the risk of their engaging in bribery.

When considering whether due diligence should be performed or deciding what level of due diligence should be performed on a Third Party, the following risk-based factors should be taken into account:

- The nature and structure of the transaction (certain types of transactions give rise to higher bribery risks, e.g., those involving Government Officials);
- The reputation and professional capacity and experience of the Third Party;
- Any evidence or suggestion of an improper motive for hiring the Third Party; and
- Whether there is information suggesting that the Third Party may engage another party to assist it in completing any work.

A record must be kept by the entity of all due diligence conducted on Third Parties, for a minimum period of five (5) years. All arrangements with Third Parties should be subject to clear contractual terms with appropriate representations by the Third Party to comply with applicable laws relating to anti-bribery and anti-corruption, including the FCPA.

## **GIFTS AND ENTERTAINMENT**

### **Business courtesies**

We recognise that the exchange of business courtesies, such as modest gifts, and entertainment (including meals, invitations to attend promotional events or parties) particularly during festive periods is customary and legitimate to create goodwill, and/or strengthen business and commercial relationships. Such courtesies are allowed if they are not lavish in the light of accepted business practices of the relevant businesses that we operate in and is not intended to improperly influence the decisions of the person involved.

### **Basic rules on gifts and entertainment**

Pending the roll-out of an independent gift and entertainment policy for the Group, some basic rules that should be observed when offering or receiving a gift or entertainment:

Do not give or accept cash (including ang pows) or any other cash equivalent (including gift vouchers);

Lavish or unreasonable gifts or hospitality, whether these be given or received are unacceptable as they may be construed as a bribe:

Gifts and entertainment that are below the amounts stated below are generally acceptable and need not be declared, provided that such gifts and entertainment have not been given in order to secure or reward an improper benefit or improper performance of a function, activity or to procure an unfair business advantage. Persons must however avoid placing themselves in situations which could create personal obligations that other persons could exploit to obtain a preferential treatment.

(a) Gifts Maximum limit (in Singapore Dollars or equivalent in foreign currency): \$50

(b) Entertainment involving meals Type Maximum limit (in Singapore Dollars or equivalent in foreign currency) per head \$30.

Where a gift or an entertainment exceeds the limits above, it must be declared by Persons to the relevant head of department. Approval must be sought from the relevant head of department before the gift or meal may be received or provided Gifts and entertainment should have a justifiable business purpose;

**No gift or entertainment:**

(a) should be given or accepted from a supplier during a tender/pitch/contract renewal or dispute (ongoing or potential), regardless of its value. If you are offered a gift or hospitality during this period, please consult with the Chief Legal and Compliance Officer or the Compliance Department; or

(b) should be given to customers and Third Parties to whom we are pitching, with whom we are negotiating or renewing a contract, or with whom we are or are likely to be in dispute without first obtaining approval from the Chief Legal and Compliance Officer or the Compliance Department.

**Questions on gifts and entertainment**

If you have any queries on whether a gift or entertainment is appropriate in any circumstance, please seek guidance from your head of department before you incur the expense or accept the gift and/or entertainment. In case of further doubt, all queries should be directed to the Compliance Department.

**CHARITABLE, RELIGIOUS AND POLITICAL CONTRIBUTIONS**

All contributions or donations, is a matter to be decided by the Board of Directors.

**HIRING DECISIONS**

Independence in hiring. Persons should not place themselves in a situation where they are made to compromise the Company's interest by a current or prospective business partner, vendor, customer or a Government Official in a hiring process. Hiring should not be made in exchange for benefits.

While there is no absolute prohibition on hiring persons recommended by others, such hiring decisions should not be part of any decision that is related to the Company's commercial transactions. Offers of employment should not be given in exchange for an unfair advantage in any business negotiation. Hiring of close family members of Government Officials and customers should be reviewed by the Board of Directors to make sure that the hiring is not an inducement for future business.

**Reporting**

If a current or prospective business partner, vendor, customer or a Government Official offers to give a benefit to the Company or any Group entity in exchange for the hiring of a suggested person, or if any such person threatens to take adverse action if the suggested person is not hired, the correct approach to take is not to hire the suggested person. If you should encounter such a situation, you should report the incident to your supervisor or to the Chief Legal and Compliance Officer.

**Consequences of violation**

If any Person fails to report known or suspected violations, they may be subject to disciplinary action, including termination of employment.

## **RECORD KEEPING**

### **Proper documentation**

It is the responsibility of every Person to ensure that all benefits which are received or provided are fully and accurately reflected in the Company's books and records. The following information must be documented to substantiate each benefit provided under this Policy:

- Business purpose;
- Benefit received/provided and its value;
- Date;
- Location and establishment (where a meal is hosted);
- Name, title and employer, Government Official or the affiliation of the public servant;
- Names and affiliations of other participating persons.

At a minimum, all such records must be kept for five (5) years.

## **REPORTING ACTUAL OR SUSPECTED WRONGDOINGS**

### **Whistleblowing**

Any Person who observes or suspects that another Person or anyone else may be acting in contravention of this Policy has an obligation to report it. Appropriate follow-up action will be taken.

Any Person who fails to report known or suspected violations may be subject to disciplinary action including termination of employment. In Singapore, a failure to report known or suspected violations by way of a Suspicious Transaction Report to the Commercial Affairs Department may also result in an offence under the Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) Act.

### **Reporting should not be delayed**

Reporting should be made without delay as prompt reporting and resolution of corruption or bribery issues in many cases are required by applicable law or regulatory requirements.

### **Confidentiality and Non-retaliation**

Any report made will be treated with utmost confidentiality. No Person acting in good faith will suffer adverse consequences to his employment or retaliation for reporting or for refusing to engage in prohibited conduct, even if such refusal results in loss of business opportunities to the Company.

Every Person should be assured that there will be no retaliation taken against anyone who has, in good faith (i) sought advice regarding any conduct that may be implicated by this Policy, (ii) has reported a good faith suspicion of a violation of this Policy, or (iii) refused to participate in any conduct that may violate this Policy.

## **QUESTIONS**

If you have any questions relating to this Policy, in particular on the propriety of the conduct or the manner of handling any transaction, you should consult your CEO or the Board of Directors.

No exceptions to the guidelines set out in this Policy may be made except with the prior written consent of the Board of Directors.

Any Person found to have engaged in prohibited conduct or ignored suspicious activity may face disciplinary action, including termination of employment or contract and/or referral to appropriate law enforcement/regulatory authorities.