



CHEMANEX PLC

POLICY ON ANTI-BRIBERY AND CORRUPTION

Policy Statement

Chemanex PLC is built on promoting integrity, transparency and accountability, safeguarding the Company's reputation and fostering trust among stakeholders. The Company is therefore dedicated to maintaining professional, fair and ethical conduct with integrity in all our business relationships along with effective ways to counter corruption within the Company.

The policy on anti-bribery and corruption establishes clear guidelines and procedures to prevent, detect, and address bribery and corruption in all aspects of the Company's operations ensuring that they are free from bribery and corruption in compliance with applicable anti-bribery laws, anti-money laundering laws and countering the financing of terrorism laws.

Fundamental principles

The Company's anti-bribery and corruption policy is based on the following fundamental principles:

- Zero tolerance for any bribery or corruption that takes place in or relating to the Company.
- Regulating a mindset of honesty, integrity and transparency among employees throughout the work environment.
- Commanding the necessary awareness and commitment to detect and prevent bribery and corruption in the Company.
- Enforcement of effective mechanisms to counter bribery and corruption.
- Adherence to all applicable laws regarding anti bribery and corruption; anti-money laundering and countering the financing of terrorism laws.

Compliance with laws

Directors and employees are required to strictly adhere to their obligations under the Anti-Corruption Act, No. 9 of 2023; Prevention of Money Laundering Act, No. 5 of 2006; Convention on the Suppression of Terrorist Financing Act, No. 25 of 2005 and Financial Transactions Reporting Act No. 06 of 2006 (including any regulations made thereunder). They are therefore expected to familiarize themselves with the law to prevent inadvertent violations and avoid even the appearance of an improper transaction.

Gifts and Entertainment

Whilst business gifts and entertainment are customary in many parts of the world, they need to be viewed with caution. Accepting excessive gifts or entertainment can affect – or be perceived to

affect – business judgement and can create expectations on the part of those giving them, which can embarrass the Company if not met. Similarly, offering excessive gifts or entertainment to others can be open to misinterpretation.

The following guidelines will therefore apply in respect of gifts and entertainment:

- Any gift that is given or received with a commercial value must be reported to the manager except for any items branded by the supplier with their logo and valued at less than Rs. 10,000/-.
- It may be acceptable to consider a gift or award in cash which is in turn donated to charity but only if this is consistent with Company policy and does not violate the principle that it will not condone bribes, graft and illegal payments. All such gifts received should be recorded on a register maintained by the Group Chief Financial Officer.
- Cash gifts may not normally be offered by or on behalf of the Company. Exceptions to this would be where cash gifts are made on ceremonial, sports or festive occasions where this is socially customary, and the Company would create offence by not making the gift. Any such gifts shall be approved by the Group Chief Financial Officer.
- No gifts or favours should be offered to any politician, government employee, political official or member or employee of any regulatory body.
- Reasonable business-related entertainment is unobjectionable where it is customary and is approved by higher management on the basis that it is in the best interests of the Company.
- If an employee is offered or receives a gift or entertainment which contravenes the guidelines set out in this policy, he or she must inform the respective head of department immediately.

Training

The policy will be supported by training programs, workshops and awareness building for directors and employees to enable them to fulfil their roles and responsibilities under this policy.

Amendments

The policy shall be reviewed by the Board of Directors periodically and updated as necessary to reflect changes in the business environment or regulatory requirements.

Point of contact

For clarifications or further information regarding this policy, please contact the Compliance Officer.