



ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT

BSG Landscape & Construction Pte Ltd (BSG) (together the “Company” or “BSG”) are committed to operating our businesses as a responsible and trustworthy company, with integrity and zero-tolerance attitude towards corruption.

This Anti-Bribery and Corruption Policy (the “Policy”) aims at providing all BSG employees with a framework of principles to comply with in all our business operations and a set of prohibited conducts because they may qualify as corruption or influence peddling.

This Policy sets forth the Company’s minimum compliance standards with respect to interactions with third parties. BSG do not offer or pay or accept any bribes for any purpose whether directly or through a third party. This applies to domestic and foreign governments, as well as to a private party (called as commercial bribery).

I) Scope of Policy

The principles and obligations apply to all employees of the Company and its contractors (which include agents, consultants, outsourced personnel and other representatives). As such, each of us is responsible for adhering to these standards in our business interactions, and we must ensure that all Company contractors retained by us understand that they are responsible for complying with this Policy when acting on behalf of the Company.

II) Definition of corruption

(a) The unlawful offering or promise to offer (active corruption); or

(b) The unlawful request or acceptance (passive corruption),

directly or indirectly, of any offer, promise, gift, or advantage of any kind to:-

(c) Carry out or abstain from carrying out an act of one’s function, duty or mandate; or

(d) Abuse one’s real or supposed influence with a view to obtaining distinctions, employments, contracts or any other favourable decision.

Corruption, as defined in the present policy, includes bribes, kickbacks, influence peddling, extortion, facilitation payments and the laundering of such practices. A bribe or corrupt action includes the receiving, offering, promising, authorizing or providing anything of value to any customer, business partner, vendor or other third party in order to secure, induce or keep an improper or unfair advantage.

III) Conducts required or prohibited

General

To guide our actions as we conduct our business, the standards set out below are to be followed. In no event may an employee for him/ herself or on behalf of a third-party, or a third-party on behalf of the employee:

- give, promise to give or offer a payment, a cash donation, a commission, a present, a trip, an invitation or any other form of gratification, with the expectation or hope to receive an undue advantage or as a reward for an undue advantage already obtained;
- accept or solicit a payment, a cash donation, a commission, a present, a trip, an invitation or any other form of gratification from a third party known to be or suspected of expecting an undue advantage therefrom;
- make a facilitation payment in any form whatsoever, to a public service representative, an agent or an intermediary, to facilitate or expedite a routine procedure.

If an employee finds him/herself in an exceptional situation where, out of fear for his/her life, health or freedom, there is no other option than to yield to an attempted extortion, he/she should take the steps as deemed necessary under the circumstance to protect him/herself. In any event, the employee must report any attempt at corruption or influence peddling as soon as possible to his/her immediate superiors, who are then in charge of coordinating the appropriate response to the incident.

Gifts and Hospitality

The act of exchanging business gifts and receiving corporate hospitality can play an appropriate role in building or maintaining business relationships. However, inappropriate offering or acceptance of a present or invitation, particularly with the intention of influencing the outcome of a business transaction or obtaining an undue advantage in return therefor, is prohibited.

Accepting gifts, discounts, favours, or services from a current or potential customer, competitor, supplier, or service provider is prohibited if that benefit has the potential to influence a person's business decision. Functions like sales and procurement must take extra care.

Gifts are only permitted if they are:

- reasonable;
- infrequent;
- unsolicited;
- not cash or a cash equivalent; and
- not given with an intent to influence a business decision.

You must not accept or offer entertainment or hospitality unless the activity:

- permits business or educational discussions at the meal or event (a Company representative must be in attendance at the meal or event);
- is part of a genuine business relationship;
- is not intended and could not be perceived by others to improperly influence business decisions;
- is consistent with industry practices, all applicable laws and our Company policies and procedures;
- is not excessive in value or quantity, as defined by local procedural documents; and
- would not embarrass our Company if it was brought to public attention.

Where local law or divisional internal policies require more stringent processes/ controls, then such more stringent processes/ controls must be followed.

Dealings with public officials

No employee of BSG shall use either his/her own or the Company funds, resources or facilities to make any payment or contribution to incentivise any public official who can directly or indirectly decide whether to transact with us or influence any decision that would benefit BSG.

In addition to the other principles set forth in this Policy, you must:

- not make political contributions to political parties or organisations or election candidates;
- not offer or assist to procure any employment offer to the children or relatives of public officials, whether with BSG or with other organisations;
- be cautious when dealing with public officials who can influence decisions that could benefit business, and can be susceptible to bribery;
- ensure that all interactions with political and public officials are conducted in a manner that adheres to this Policy and comply with all relevant laws;
- Not give or offer to give or authorize to give anything of value that could be considered to be a bribe
- Not request or accept or authorise the request or acceptance of, directly or indirectly, anything of value that could be considered to be a bribe
- know what this Policy means and comply with it

Third parties engagement

The Company could be held responsible for the actions of a third party (e.g. distributor, agent, contractor, supplier, joint venture partner) acting on its behalf. As such, care must be taken to ensure that those third parties do not engage or attempt to engage in any form of corruption.

You shall:

- ensure that any new third parties (or third parties whose contracts are being renewed) who provide services for or on behalf of the Company contractually agree to abide by the principles set out in this Policy;
- undertake sufficient due diligence in relation to any new third party's engagement to ensure that there is no corruption. This may include a search of the database on anti-bribery and sanctions lists and checking for relationships with public officials;
- repeat due diligence every year for ongoing third party relationships or those which have not previously been checked.

Charitable contributions

BSG supports social enterprises and the communities in which we operate. Any charitable contributions and sponsorship made with the Company funds or resources must be appropriate and genuine. Charitable contributions may only be given to recognised non-profit charitable organisations. All donations must be compliant with local law, regulations or the internal policies of the Company.

Donations must not:

- be made to individuals or in cash;
- be made at the request of a public official as an inducement to or reward for acting improperly; or
- be made as a reward for obtaining or retaining an advantage for or influencing a decision favourable to BSG or any other improper purposes.

Employees are briefed that any bribery and corruption issues can be reported to the CPIB Corruption Reporting & Heritage Centre Via Walk in personally located at

Address: 247 Whitley Rd, Singapore 297830

Phone: 1800 376 0000

Or via their online website : <https://www.cpiib.gov.sg/e-services/e-complaint-for-corrupt-conduct>

Whistle Blowing Channel : 96901295

Hotline : 65700555 or email : bryan@bsg.com.sg

The management will ensure that any reports / complaints are handled in a confidential manner and the personnel make report/ complaint will not be subjected to retaliation or negative consequences.



Bryan Guay, Director

BSG Landscape & Construction Pte Ltd