

SML ISUZU LIMITED

ANTI-BRIBERY AND ANTI-CORRUPTION (ABAC) POLICY

SML Isuzu Limited (the Company) is committed to conducting business with integrity and in accordance with all applicable rules and regulations. The Company does not tolerate bribery and corruption in any form and has an effective system to, detect, prevent & counter bribery and other corrupt business practices from its operations.

1. Purpose

The purpose of this Anti-Bribery and Anti-Corruption Policy (the Policy) is to outline guiding principles and appropriate procedures to prevent any activity or conduct involving bribery, facilitation payments, or corruption, as well as to demonstrate the Company's commitment to conducting business in an ethical and lawful manner. It aims to ensure compliance with all local and international anti-bribery and anti-corruption laws and regulations.

2. Scope

The Policy applies to all Directors, Employees of the Company working at all levels and grades (whether permanent, fixed-term or temporary), Business Associates, Consultants, Contractors including all other person directly or indirectly associated with the Company or acting on its behalf.

3. Definitions:

- **Bribery:** The offering, giving, receiving, demanding, or accepting of an unwarranted advantage in exchange for an illegal, immoral, or trust-breaching conduct. Bribes often involve payments but also includes, promises of payments, anything of valuable, providing inappropriate gifts, hospitality and entertainment, inside information, offering employment, etc. to get favourable decision.
- **Corruption:** The abuse of entrusted power for personal / private gain. Corruption includes wrongdoing on the part of an authority, or those in power, through means that are illegitimate, immoral, or incompatible with ethical standards. It is usually designed to obtain financial benefits or other personal gain.

4. Policy statement:

- The Company does not tolerate bribery or corruption in any form in all its business dealings and relationships. The Company is committed to ensure adequate system & procedures to detect, prevent and counter bribery and corruption in any of its form or manner.
- Offering, giving, receiving, demanding or accepting bribes directly or indirectly, or involving in such activities is strictly prohibited in the Company.
- The Company follow zero tolerance approach for bribery and corruption. To offer cash or cash equivalents, or make any illegal payments, remuneration, gifts, donations directly or indirectly to influence the business decisions are strictly prohibited. However, gifts or

hospitality as an ordinary business gestures is permissible, if these are reasonable, made in good faith, not intended to influence business decisions and are in compliance of the Company's policies.

- The Company complies with all relevant rules and regulations and conducts business with integrity. The Company uphold and mandates adherence to all applicable anti-bribery and anti-corruption laws & regulations to prohibit bribery and corruption in any of its form in all its business operations.
- The Company do not support or aligned to any specific political party or its candidate and do not offer or give any Company's funds or other its resources to any political party or its candidate to influence the outcome of public elections or for undue favourism.
- The Company is dealing with all its Business Associates with the highest standard of integrity and in compliance with all relevant laws and regulations. The Company also expects that all its Business Associates shall adhere & follow its business ethics.
- The Company has a Compliance Officer to oversee compliance with applicable regulations and represent the Company in regulatory interactions. Every query, reports, complaints, doubts or concerns in relation to any suspected violation of this policy shall be routed through the Compliance Officer for its investigation & resolution.
- The Company shall regularly undertake risk assessments in order to identify all types of business risks, such as bribery, corruption, and unethical behaviors, in all of its business operations and to reinforce appropriate processes and procedures for mitigation.
- This Policy should be read in conjunction with all other relevant policies of the Company such as Code of Ethics & Conduct, Whistle-blower Policy etc. or other advisories of the Company issued from time to time.

5. Reporting and Investigation:

- Employees and individuals associated with the Company are encouraged to report any suspected bribery or corruption practice/s or any breach of this Policy whenever they noticed through the designated whistleblowing channels.
- All complaints will be investigated promptly and brought to the notice of the Management on a regular basis. The Company will maintain confidentiality and protect the whistleblowers from any retaliation.

6. Communication and awareness:

- The Company shall provide regular awareness to its Employees about this Policy, their obligations, procedures and measures.
- The Company shall extend awareness of this Policy to all its Business Associates.

7. Consequences of Non-Compliance:

- Any violation of this Policy will be treated as a serious offence and strict action will be taken against the violators.
- Investigation of all suspected violations will be conducted to ensure justice and plug the loophole, if any, to prevent re-occurrence of such incidents.

8. Review and Amendments:

This Policy is applicable from 2nd August, 2024.

The Company will review this policy periodically and update it whenever required to reflect changes in laws, regulations, and company operations and will be communicated to all its employees and relevant stakeholders.
