



Anti-Bribery & Anti-Corruption Policy

DUO ENERGY PTE LTD

Policy Statement

Duo Energy is committed to upholding the highest standards of honesty, integrity, transparency, and ethical business conduct in line with its core values.

The company maintains a **zero-tolerance** stance toward bribery and corruption, recognizing the severe negative impact such practices can have on its business, reputation, and operations.

Duo Energy is dedicated to complying with all applicable **Anti-Bribery and Anti-Corruption laws, rules, and regulations** in every jurisdiction where it operates or conducts business.

Scope

This policy establishes the guiding principles for Duo Energy to conduct business with fairness, integrity, and ethical responsibility.

It sets the **minimum standards** that must be adhered to. In jurisdictions where local laws impose stricter regulations, the higher standard must be followed.

This policy applies to **all employees and company members** (both permanent and temporary) across all locations where Duo Energy operates. Additionally, it extends to **third parties**—including agents, intermediaries, and representatives—who act on behalf of the company, ensuring their full compliance with this policy.

Definition

- ❖ **Bribery** refers to offering, giving, receiving, or soliciting a financial or other advantage to influence a business decision. This includes cash payments, extravagant gifts, excessive hospitality, or any other form of undue benefit.

- ❖ **Corruption** involves the misuse of power or position for personal gain. It is illegal and often associated with bribery, fraud, money laundering, and, in extreme cases, the financing of criminal activities.

Unchecked bribery and corruption undermine governance, democratic processes, fair competition, and economic development, leading to market distortions and financial instability.

Charitable Donations and Sponsorships

Duo Energy is committed to positively contributing to the community through **charitable donations and sponsorships** aligned with its values and business objectives.

All donations and sponsorships must:

- ❖ Comply with the **Entertainment, Gifts, and Benefits Guidelines** outlined in this policy.
- ❖ Not be used to improperly influence business decisions or gain undue advantages.
- ❖ Be subject to due diligence to ensure they are not improper payments or policy violations.

No employee may authorize donations or sponsorships on behalf of the company **without prior approval from Senior Management**. All proposed contributions must undergo review and, if necessary, due diligence on the recipient organization.

Agents, Intermediaries and Representatives ("Third Parties")

Duo Energy may engage **third parties**—such as agents and intermediaries—for business activities, particularly in jurisdictions where the company lacks a direct presence.

Since the actions of these third parties can expose Duo Energy to legal liability, the company ensures that all external partners uphold the principles of this policy.

Due diligence is required before engaging any third party, including:

- ❖ Assessing the **nature and structure** of the transaction.
- ❖ Verifying the **reputation, experience, and qualifications** of the third party.
- ❖ Investigating any potential **improper motives** for engagement.

- ❖ Checking for **negative news or red flags** through market intelligence and background verification.
- ❖ Ensuring full **disclosure of subcontracting** arrangements, which must be properly documented.

All agreements with third parties must include **clear contractual terms** requiring strict compliance with **Anti-Bribery and Anti-Corruption laws**.

Employees are responsible for ensuring that third parties act ethically and fully understand Duo Energy's **zero-tolerance** stance on bribery and corruption. The company will **terminate relationships** with any third party that fails to meet its standards.

Accounting, Records, and Financial Integrity

To comply with **Anti-Bribery and Anti-Corruption laws**, all financial transactions must be:

- ❖ **Properly authorized, documented, and recorded** in company records.
- ❖ **Accurately accounted for**, including all payments to third parties.
- ❖ **Subject to audit and review** to ensure compliance with financial reporting obligations.

Any attempt to create **false or misleading records** constitutes misconduct and may result in **disciplinary action or termination**.

Secret, unrecorded, or unreported transactions are strictly prohibited under this policy.

Reporting and Enforcement

All employees and company members have a duty to **report suspected cases of bribery or corruption** to Senior Management, unless restricted by applicable law.

Duo Energy will **investigate all allegations** and take **appropriate disciplinary or legal action** against any individual or entity involved in bribery, corruption, or other unethical activities.

Review

Duo Energy will periodically **review and update** this policy to ensure its continued relevance, effectiveness, and compliance with evolving regulations.