

**Objective:**

It is the policy of the Company to conduct all of its business activities with honesty, integrity, and the highest possible ethical standards and vigorously enforce its business practice of not engaging in bribery or corruption.

**Scope:**

This anti-bribery and anti-corruption policy (this “Policy”) applies to all individuals of the Company at all levels and grades, including directors, senior executives, officers, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers, volunteers, interns, agents, or any other person associated with the Company.

**Policy Details:**

A “bribe” is defined as anything of value and includes, but is not limited to: cash, cash equivalents, gifts, inside information, sexual or other favors, corporate hospitality or entertainment, offering employment to a relative, payment or reimbursement of travel expenses, charitable donation or social contribution, political contributions, abuse of function and can pass directly or through a third party.

Corruption includes wrongdoing on the part of an authority or those in power through means that are illegitimate, immoral, or incompatible with ethical standards. Corruption often results from patronage and is associated with bribery.

Employees or members of their immediate families (spouse, mother, father, son, daughter, brother, sister or any of these step- or in-law relationships, whether established by blood or marriage including common law marriage) should not provide, solicit or accept any bribe to or from competitors, vendors, suppliers, customers, or others that do business or are trying to do business with IKF. All relationships with those with whom the Company deals should be cordial, but must be on an arm’s length basis. Nothing should be accepted, nor should the employee have any outside involvement, that could impair, or give the appearance of impairing, an employee’s ability to perform his/her duties or to exercise business judgment in a fair and unbiased manner.

**Gifts & Hospitality**

Providing gift or hospitality is acceptable provided with the intention to improve the image of the Company, better present its products and services, or establish cordial relations.

**What is not acceptable under this Policy?**

- i) accept an offer of a gift of any size from any Third Party which is in negotiation with, or is submitting a proposal with us;
- ii) give, promise to give, or offer, any payment, gift, hospitality or advantage with the expectation or hope that a business advantage will be given or received or to reward a business advantage already given;
- iii) give, promise to give, or offer, any payment, gift or hospitality to a government official, agent or representative to “facilitate” or expedite a routine procedure;
- iv) accept or solicit any payment, advantage, gift or hospitality from a Third Party that you know or suspect is being offered with the expectation that it will obtain a business advantage for them;
- v) threaten, or retaliate against, another employee who has refused to commit a bribery offence or who has raised concerns under this Policy; or
- vi) engage in any activity that might lead to a breach of this Policy.

The points stated above are illustrative in nature and in no way intend to limit the applicability of this Policy.

### **Charitable Donations**

As part of its corporate citizenship activities, the Company may support local charities or provide sponsorship only make charitable donations that are legal and ethical under the laws and practices and also within the corporate governance framework of the organization.

### **Political Activities**

We do not make contributions to political parties, political party officials or candidates for political office. Payment or use of corporate assets of any type as payment, directly or indirectly to any person, business, political organization, or public official for any unlawful or unauthorized purpose is prohibited. We should not make any political contribution on behalf of the Company and use any Company resources to assist a candidate or elected official in any campaign, or coerce or direct another employee to vote a certain way.

### **Business Relationships**

The Company expects all Third Parties doing business with the Company to approach issues of bribery and corruption in a manner that is consistent with the principles set out in this Policy. The Company requires all Third Parties to cooperate and ensure compliance with these standards, to continue the business relationship.

**Record-keeping**

Must ensure all expenses claims relating to hospitality, gifts or expenses incurred to Third Parties are submitted and specifically record the details for the expenditure. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts will be kept “off-book” to facilitate or conceal improper payments and the same is ensured through effective monitoring and auditing mechanisms in place.

**Protection**

The Company encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future.

**Waiver and amendment of the Policy**

The Company is committed to continuously reviewing and updating the policy and procedures based on the learning.. The HR Team will monitor the effectiveness and review the implementation of this Policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Therefore this document is subject to modification from time to time. Any amendment or waiver of any provision of this Policy must be approved in writing by the Company’s Board of Directors. The Policy will be reviewed and audited from time to time which requires cooperation from all concerned.