



ANTI-BRIBERY & ANTI-CORRUPTION POLICY

Kubera Capital Markets Ltd. (Kubera / we) is committed to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate.

This policy applies to individual employees, agents, suppliers, consultants or any other people or bodies associated with Kubera or any of its subsidiaries and employees.

WHAT IS BRIBERY AND CORRUPTION?

Bribery is the offering, promising, giving, accepting or soliciting anything of value in order to improperly influence a person's actions or decisions to gain or retain a business benefit or personal advantage.

Corruption is the abuse or misuse of entrusted power or office, whether in the public or private sector, for private gain. Examples include money laundering, embezzlement, secret commissions, falsification of records and corruption of justice.

Bribery and corruption can take many forms, including the provision or acceptance of cash payments, facilitation payments, kickbacks, political donations, charitable donations, social benefits, gifts, travel, hospitality/entertainment and rebates or reimbursements.

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official, such as payments relating to the issue of a permit or licence, or the provision of utility services. Regardless of whether legal or not in a country, whether they are a "way of doing business" in a country, and even if nominal in amount, facilitation payments are prohibited under this policy.

A **kickback** is a payment for awarding business given to a person in a position of power or influence for having assisted the supplier in relation to the awarding of the business.

Giving or accepting bribes or other improper payments are serious criminal offences and can result in criminal and civil penalties.

ANTI-BRIBERY AND CORRUPTION POLICY

We take a zero-tolerance approach to bribery and corruption. Our Anti-Bribery and Corruption Policy reflects our commitment to this. Our Policy is:

- Kubera takes a zero-tolerance approach and prohibits all forms of bribery and corruption. This prohibition applies to dealings with private and public businesses and individuals, as well as public officials.
- All business activities must be conducted with honesty and integrity, and in compliance with anti-bribery and corruption laws.
- The giving, receiving, accepting, offering or promising of a bribe or facilitation payment, either directly or indirectly, is expressly prohibited.



- Engaging in or facilitating corruption or corrupt practices is expressly prohibited.
- The payment of secret commissions to those acting in an agency or fiduciary capacity is expressly prohibited.
- Participating in procurement decisions which involve counterparties with whom there is a conflict of interest is expressly prohibited.
- Gifts, entertainment, sponsored travel and donations (charitable or otherwise) must not be provided or accepted in circumstances which could be interpreted as creating an obligation, or where an employee's impartiality could be affected or be perceived to influence a business decision, including during any periods of contract negotiations.
- Unless approved by the Board political donations are prohibited. Attendance at any political fundraising event must be approved by the Managing Director.
- Training and awareness about our zero tolerance for bribery and corruption is undertaken across Kubera.
- Kubera management is committed to promoting a culture of compliance with our zero-tolerance policy.
- Business activities must be transparent, and sufficiently documented.
- Appropriate due diligence must be conducted, documented, and communicated with those who we do business with, in order to satisfy Kubera that the third-party agent understands and will comply with this policy.
- It is expected non-wholly owned subsidiaries and applicable joint venture/alliances will adapt their rules and guidelines as much as possible to be consistent with this policy.