

Anti-Bribery and Corruption Policy (For External Parties)

General

PUC Group is committed to doing business honestly and ethically, with integrity, and in full compliance with all applicable laws and regulations. PUC Group will therefore only deal with suppliers, vendors, contractors, agents, customers and any other third parties (“Third Parties”) that subscribe to an acceptable standard of integrity in the conduct of their business.

Application

1. PUC Group expects Third Party to comply with this Policy. All Third Parties are also to ensure that their employees, directors, representatives, sub-contractors, agents etc comply with this Policy, where relevant.
2. A Third Party (including his/her/its employees, directors, representatives, sub-contractors, agents etc) may not take any action to circumvent the prohibitions in this Policy. A Third Party must in every instance comply with the rules concerning solicitation, bribery and corruption set out in this Policy, as well as with applicable laws concerning bribery and corruption.
3. Failure by a Third Party to comply with the principles and standards set out in this Policy may result in the termination of the Third Party’s relationship with PUC Group and other adverse consequences (e.g. PUC Group may make a police report where required).
4. If the Third Party perceives that a provision of this Policy conflicts with the law in the Third Party’s jurisdiction, the Third Party should consult PUC Group, rather than disregard the Policy without consultation.
5. If a Third Party (and/or his/her/its employees, directors, representatives, sub-contractors, agents etc) becomes aware of or suspects any actual, possible or perceived contravention of this Policy, such circumstances shall be reported to PUC Group via PUC Group’s Whistleblowing Channels. Please refer to <https://www.puc.com/policies-procedures/> for more details.

Duties of Good Faith, Fidelity, Diligence and Integrity

Conflict of Interest

1. Duty Regarding Avoidance of Conflict of Interest

- i. A conflict of interest arises in a situation where a Third Party (and/or his/her/its employee, director etc) is a family member or relative of an employee, director etc of PUC Group and takes advantage of that relationship for the Third Party's benefit. Situations in which conflicts of interests may arise includes, but is not limited to, when an employee of PUC Group exercises his/her authority and gives preference to the Third Party in detriment to the interests of PUC Group.
- ii. Prior to engagement with PUC Group, the Third Party shall declare to PUC Group if it is aware of any potential conflict of interests arising from a family relationship between the Third Party, his/her/its employee, director etc and an employee, director etc of PUC Group.

Fighting Corruption and Unethical Practices

1. Solicitation, Bribery and Corruption

- i. A Third Party (including his/her/its employee, director etc) is prohibited from, directly or indirectly, soliciting, accepting, obtaining, agreeing to accept or attempting to obtain, from any party for itself or for any other party, any bribe or gratification as an inducement or a reward for doing or forbearing to do, or for having done or forborne to do, any act in relation to any of its business dealings, including PUC Group's affairs or business, or for showing favour or forbearing to show disfavour to any party in relation to any of its business dealings, including PUC Group's affairs or business.
- ii. A Third Party (including his/her/its employee, director etc) may not directly or indirectly offer, promise or give any bribe as an inducement or a reward for doing or forbearing to do, or for having done or forborne to do, any act in relation to any of its business dealings, including PUC Group's affairs or business, or for showing favour or forbearing to show disfavour to PUC Group in relation to any of its business dealings, including PUC Group's affairs or business, whether in the form of a facilitation payment, kickback, donation, fee or any other form.
- iii. Even the appearance of conduct prohibited by this Policy, or any other measure that is unethical or that will tarnish PUC Group's reputation for honesty and integrity, must be avoided.

Fighting Corruption and Unethical Practices (Cont'd)

2. Providing Gifts, Entertainment and Corporate Hospitality

- i. In accordance with PUC Group's No Gift Policy, PUC Group and its employees, directors etc are not allowed to receive any form of entertainment, gifts or corporate hospitality from any Third Party (including his/her/its employees, directors etc).
- ii. All Third Parties are requested not to provide any form of entertainment, gifts or corporate hospitality to PUC Group and/or its employees, directors etc.

3. Facilitation Payment

- iii. A Third Party is prohibited from, directly or indirectly, giving, accepting or obtaining or attempting to give, accept or obtain facilitation payments from any person in the course of conducting business with and/or on behalf of PUC Group.
- iv. In this part, the term "facilitation payments" generally means payments made to secure or expedite the performance by a person performing a routine or administrative duty or function.

4. Public Officials

- i. In the course of business dealings with PUC Group, a Third Party (including his/her/its employees, directors etc) is prohibited from offering gifts and entertainment, including travel-related expenses, to government officials or their family/household members for the purpose of improperly influencing the government officials to take action in favour of the Third Party or to refrain from taking action adverse to the Third Party.
- ii. In the course of business dealings with PUC Group, a Third Party (including his/her/its employees, directors etc) is prohibited from paying for travel and hospitality for any government official or his/her family/household for the purpose of improperly influencing the government official to take action in favour of the Third Party or to refrain from taking action adverse to the Third Party.
- iii. A Third Party (including his/her/its employees, directors etc) must comply with local laws concerning lobbying in any jurisdiction where lobbying activities are performed by the Third Party in the course of business dealings with PUC Group.
- iv. In the course of business dealings with PUC Group, a Third Party (including his/her/its employees, directors etc) may not offer or provide gifts or anything else of value to any person, such as an agent, consultant or contractor, if the Third Party knows or suspects that a government official or his/her family member will be the indirect beneficiary or recipient.

Fighting Corruption and Unethical Practices (Cont'd)

- v. A Third Party (including his/her/its employees, directors etc) must ensure that any agent, contractor, or other representative dealing with government officials as appointed on PUC Group's behalf is evaluated and informed of the provisions of this Policy relating to restrictions on bribery and gifts to public officials.

5. Due Diligence

- i. Before and in the course of engaging any Third Party or carrying out business with any Third Party, PUC Group will conduct appropriate counterparty due diligence to understand the business and background of PUC Group's prospective business counterparties before entering into any arrangements with them. This is to ensure that PUC Group only deals with counterparties that subscribe to an acceptable standard of integrity in the conduct of their business.
- ii. All Third Parties (including their employees, directors etc) intending to carry out business with PUC Group are to cooperate with PUC Group's due diligence on the Third Party and provide the relevant information and documents requested by PUC Group.

Confidentiality Obligations/Intellectual Property/Public Communications

1. Data Protection

- i. A Third Party (including his/her/its employees, directors etc) must comply with applicable laws concerning the protection of personal privacy, including the protection of personal data.

2. Publication of Materials

- i. Except with written permission of PUC Group, a Third Party shall not disclose, publish or write any books or other works using PUC Group's confidential information.

This Policy shall take effect on 1 June 2020.