



Anti-Corruption Policy

Policy	Anti-Corruption Policy			Designed by	Steven Yap IP Manager
N°	HR/23/12	REVISION	Nil	Approved by	Tom Berry & Nick Piggott Co-CEO
Effective Date	1 March 2023			Approval date	1 March 2023
Process	Human Resources Policy			Page	7 pages

1. Purpose

1.1 This policy highlights Nutrition Technologies commitment to robust workplace integrity, ethics and transparency with strong fundamental principles and values in our work environment. This is demonstrated through our clear and concise directives for the following:

- (a) all Nutrition Technologies' employees including but not limited to permanent, fixed-term, temporary staff, casual workers, or any other person associated with Nutrition Technologies, or any of Nutrition Technologies joint ventures, affiliates, subsidiaries and their respective employees regardless of geographical locality;
- (b) all third parties and associated entities including but not limited to any individuals, trainees, interns, consultants, sponsors, volunteers, outsourced personnel, representatives, subsidiaries, agents, intermediaries, business partners, potential clients, customers, contractors, suppliers, service providers, sponsors, government, public bodies advisors, representatives, officials, politicians, political parties and candidates, public bodies such as institutes of higher learning, public and private research institutions and universities, civil servants, custom superintendents, government regulatory agencies, departments and ministries; and

(c) all Officers, Trustees, Board and committee members at any level.

1.2 This policy strictly prohibits all manner and form of bribery and corruption engagement activities and conduct which could be perceived or suspected of unlawful actions within and outside our organization, aimed to achieve the followings:

(a) restrict bribery or “kickbacks” from private, government bodies, public organizations, political parties/representatives, officials, and politicians.

(b) regulate and manage anti-corruption protocol within but not limited to Nutrition Technologies, affiliates, joint ventures and third parties.

(c) rationalize the rules and regulations pertaining to gifts, meals, travel, sponsorship, political contributions, charitable contributions, solicitation, sponsorships and Corporate Social Responsibility (CSR) events, hospitality, travel and entertainment.

(d) inform all Nutrition Technologies stakeholders including shareholders, management, employees and associated entities of the anti-corruption responsibilities to ensure strict adherence and compliance to this Policy.

(e) highlight the significance of establishing and maintaining accurate records and books with robust internal control mechanisms for all transactions.

(f) conduct appropriate due diligence for risk assessment and ensure strict compliance with this Policy.

(g) supplement other Nutrition Technologies corporate policies including but not limited to the Code of Conduct Policy, Whistle Blowing Policy, Environment Management Policy, rules and applicable laws.

2. Application

This Policy applies to Nutrition Technologies stakeholders, shareholders, affiliates, employees and associate entities comprising all Nutrition Technologies global affiliates, subsidiaries, members of the Nutrition Technologies' Board of Directors, financial control officers, independent contractors, directors and employees of any joint ventures or affiliates wherein Nutrition Technologies owns majority ownership and/or management control.

3. Bribes, Facilitation Payments and Kickbacks

3.1 No Nutrition Technologies stakeholder, employees and associate entities shall offer, promise, authorize to ask, agree, give, receive, accept, solicit or facilitate any kind of payment of any nature to or from any person, official or organization in the government, public or private sector including but not limited to any cash donation, commission, present, trip, invitation or any other form of gratification so as to induce, cause to induce or improperly influence the receiver to misuse his/her status by giving an unfair commercial advantage. These include but not limited to securing or expediting routine administrative duty performance, custom clearance, visa, permit or license approval, cargo loading or unloading, promotional expenses or activities, hiring or engaging government officials, immediate family members, providing contribution to private entity and political parties in exchange for any improper benefit or favor, including but not limited to cash and monies equivalent.

3.2 Nutrition Technologies can be held liable for the bribery and corruption activities of any third parties who offer or pay bribes to government officials, public or private entities on its behalf.

4. Gifts, Meals, Hospitality, Travel and Entertainment

4.1 No gifts of any nature or form are to be offered in any decision that affects Nutrition Technologies, its affiliates and associated entities by any authority, government official or private organization subject to Section 11 of the Code of Conduct Policy with regards to

occasional gifts and gifts having an estimated value of above USD150 or equivalent.

4.2 All gifts may be offered only on appropriate customary business and cultural occasions excluding cash or monies equivalent on a case-by-case basis as determined by Nutrition Technologies management.

4.3 Nutrition Technologies may consider providing meals and hotel accommodation to third parties who attend legitimate business meetings, conferences or events which are hosted, supported or sponsored by Nutrition Technologies with the written approval of Nutrition Technologies management.

5. Political Contributions, Charitable Contributions, Sponsorships and Corporate Social Responsibility

5.1 All contributions to political parties, candidates and government officials are not allowed directly and/or indirectly. However, this policy does not preclude Nutrition Technologies, its affiliates and associated entities from organizing and administering political action committees which are funded by Nutrition Technologies in full compliance with applicable law.

5.2 All charitable donations and sponsorship are solely for charity purpose and public good without any intention of inducing business decisions of Nutrition Technologies with the management approval.

5.3 All contributions to any Corporate Social Responsibility (CSR) activities involving local communities, municipalities, government bodies, regulatory agencies, departments or ministries and private entities shall be subjected to Nutrition Technologies management approval on a case-by-case basis.

6. Financial Controls, Books, Records and Documentation

6.1 All business and financial transactions must be properly and accurately recorded, classified and documented in the books in

accordance with Nutrition Technologies corporate policies and appropriate justification accompanied with adequate supporting evidence and approvals based on financial reporting standards. This applies but is not limited to gifts, hospitality, travel, entertainment, scholarships, grants, tenders and charitable contributions.

- 6.2 No accounts or cash funds are to be kept "off-book" to facilitate or conceal improper payments. All false documents and invoices to cover illegal payments are strictly prohibited.
- 6.3 All Nutrition Technologies, affiliates and associated entities must:
 - (a) keep proper books and records and made available for inspection by Nutrition Technologies, its auditors and/or investigating authorities.
 - (b) put in place appropriate standard internal controls and procedures in strict compliance with this Policy.
- 6.4 Nutrition Technologies, its affiliates and associated entities shall perform the following:
 - (a) review all transactions, expenses and payment requests for warning signs that potentially indicate inadequate commercial justification or inherent excessive risks.
 - (b) maintain and made available all books and records for inspection of its financial transactions, risk assessment and due diligence.

7. Auditing & Reporting

- 7.1 Nutrition Technologies, its affiliates and associated entities shall conduct periodic internal audits to ensure strict compliance to this Policy. All its employees shall cooperate in audit activities or investigations.
- 7.2 Nutrition Technologies, its affiliates and associated entities must report any suspected violations of this Policy to the management. All reporting will be treated as confidential to the extent permitted by law. Failure to report a violation of this Policy constitutes a

violation of this Policy and is subject to disciplinary actions including termination of employment.

8. Disciplinary

- 8.1 Nutrition Technologies is committed to conducting professional and ethical business. It strictly prohibits all manner of bribery and corruption activities.
- 8.2 Any violation of this Policy can lead to disciplinary actions including but not limited to, termination of employment. As such, it is important that all Nutrition Technologies, its affiliates and associated entities' employees understand this Policy and comply with all the Policy requirements.
- 8.3 Furthermore and in connection with bribery and anti-corruption, Nutrition Technologies strictly forbids any form of fraud. Fraud refers to any act or intent to cheat, trick, steal, deceive, or lie which is dishonest and in most cases, criminal. Intentional acts of fraud are subject to strict disciplinary action including dismissal and possible civil and/or criminal action against the concerned employee.

9. Training and Communication



Nutrition Technologies' zero-tolerance approach to bribery and corruption must be communicated to all its employees, its affiliates and associated entities through staff induction and training in a planned regular manner.

10. Responsibility, Monitoring and Review

- 10.1 Nutrition Technologies' Board of Directors has the overall responsibility for ensuring this Policy complies with all relevant legal and ethical obligations, and that all its employees, affiliates and associated entities are made aware of, understand and comply with this Policy.
- 10.2 Nutrition Technologies' Company Secretary shall monitor this Policy and review the effectiveness of implementation with respect

to relevancy, appropriateness and efficacy of all its internal control systems and procedures in countering bribery and corruption risks.

11. Approval

Approved by	For Nutrition Technologies,	
	 _____ Tom Berry Co-CEO 1 March 2023	 _____ Nick Piggott Co-CEO 1 March 2023

DECLARATION BY EMPLOYEE

I, _____ (NRIC/Passport No: _____), hereby confirm that I have read, understood and agreed to comply with the Anti-Corruption Policy, as amended from time to time.

I shall conduct myself with complete professionalism, integrity and be true to the spirit of the Policy in the daily execution of my duties and assignments and as an employee of Nutrition Technologies. I acknowledge that failure to abide by this Policy will lead to appropriate action being taken against me.

Signature: _____

Name: _____

Date: _____

Title	NT Anti Corruption Policy
File name	NT Anti-Corruption Policy.docx.pdf
Document ID	d1a4f20e88b79b470e9395715fa901be1e812d95
Audit trail date format	DD / MM / YYYY
Status	● Signed

Document history



SENT

15 / 03 / 2023

16:56:54 UTC+8

Sent for signature to Tom (tom@nutrition-technologies.com) and Nick (nick@nutrition-technologies.com) from hr@nutrition-technologies.com
IP: 161.142.158.147



VIEWED

15 / 03 / 2023

19:32:56 UTC+8

Viewed by Nick (nick@nutrition-technologies.com)
IP: 219.95.41.89



SIGNED

15 / 03 / 2023

19:33:10 UTC+8

Signed by Nick (nick@nutrition-technologies.com)
IP: 219.95.41.89



VIEWED

16 / 03 / 2023

10:15:45 UTC+8

Viewed by Tom (tom@nutrition-technologies.com)
IP: 115.134.194.9



SIGNED

16 / 03 / 2023

10:17:30 UTC+8

Signed by Tom (tom@nutrition-technologies.com)
IP: 115.134.194.9



COMPLETED

16 / 03 / 2023

10:17:30 UTC+8

The document has been completed.