

## Anti-Bribery Policy Statement

NeutraDC Singapore Pte. Ltd. (the "**Company**") is committed to conducting its operations fairly and openly, in line with applicable legislation, and to the highest standards of honesty and transparency in its operations both locally and internationally. We are dedicated to preventing, detecting, and responding to bribery in all aspects of the Company's domestic and international operations.

The Company has zero tolerance for corruption. This includes active bribery (the offering, promising or giving of a bribe) and passive bribery (the requesting, consenting to receive or accepting of a bribe) including kick-backs, any form of gifts, hospitality, donations and similar benefits. In addition, the Company believes that combating bribery serves the greater good of society.

The Company is concerned with protecting its operations, reputation, and relevant stakeholders, such as investors, shareholders, management, and employees, from the adverse effects of bribery and other forms of corruption. We are, therefore, committed to preventing bribery by employees and any third parties acting on the Company's behalf. We encourage whistleblowing and will protect the interests of all whistleblowers by protecting them from exposure, ensuring that no employee is vulnerable to retaliation, discrimination, or disciplinary action.

The Company will take reasonable measures to prevent bribery in its operations. If corruption is proven, we shall take decisive action, including dismissal and legal action. Bribery committed by any of our staff members or anyone acting on their behalf shall be handled as a severe infringement and shall face disciplinary action.

Our internal Anti-Bribery Anti-Corruption ("**ABAC**") Committee is responsible for overseeing the planning and effective implementation of the Anti-Bribery Management System ("**ABMS**"). The ABAC Committee reports the ABMS performance to Management.

This anti-bribery policy shall be communicated via email, awareness training, events, and meetings to all employees and persons working on behalf of the Company. All employees and persons working on behalf of the Company must be briefed and familiarised with the policy's requirements.

The Company will ensure effectiveness through implementing control measures, conducting regular reviews of the bribery risk assessment, conducting due diligence on personnel, eliminating conflicts of interest with relevant interested parties, conducting annual audit and management review, and promoting continual improvement of the ABMS as a whole.