

Introduction:

BacTech Environmental is committed to conducting its business activities with the highest standards of ethics, integrity, and compliance. We have a zero-tolerance approach towards corruption in any form and strive to prevent any involvement in corrupt practices. Our Anti-Corruption Policy includes the following key principles:

Policy Statement:

- 1. <u>Compliance with Laws</u>: We strictly adhere to all applicable laws and regulations related to anti-corruption, including the Corruption Foreign Officials Act (CFOA) and other relevant international and local laws. We expect all employees, contractors, and business partners to comply with these laws and regulations as well.
- Prohibition of Bribery: We prohibit the offering, giving, solicitation, or acceptance of any bribe, kickback, or improper payment, whether in cash, gifts, services, or any other form.
 We maintain transparent and fair business practices and promote competition based on merit.
- 3. <u>Gifts and Entertainment</u>: We recognize that customary and reasonable business gifts and entertainment can be a part of building professional relationships. However, these must be given and received within legal and ethical boundaries, without any intention to influence business decisions improperly.
- 4. <u>Conflicts of Interest</u>: We expect all employees to avoid conflicts of interest that may compromise their judgment or objectivity. This includes refraining from engaging in personal or financial relationships that may interfere with their duties or give rise to the perception of impropriety.
- 5. <u>Political Contributions</u>: BacTech values the integrity of its relationships with government agencies, officials, political parties, leaders and candidates for public office and expects its employees and its third parties to conduct themselves properly when dealing with Public Officials. BacTech prohibits political contributions in the name of or on behalf of the Company.
- 6. <u>Due Diligence</u>: We conduct thorough due diligence on our business partners, including suppliers, contractors, and agents, to ensure they uphold similar ethical standards and do not engage in corrupt practices. We carefully select and engage with trustworthy and reputable partners.
- 7. <u>Reporting and Whistleblower Protection</u>: We encourage all employees and stakeholders to report any suspected or actual instances of corruption, bribery, or unethical conduct through our confidential reporting channels. We guarantee protection against retaliation for those who report in good faith.
- 8. <u>Training and Awareness</u>: We provide regular training and awareness programs to educate employees about anti-corruption laws, policies, and best practices. This ensures that





- employees understand their responsibilities and know how to identify and address potential corruption risks.
- 9. <u>Investigation and Disciplinary Actions</u>: We promptly investigate any reported allegations of corruption or unethical conduct. If violations are substantiated, appropriate disciplinary actions will be taken, including but not limited to termination of employment, contract cancellation, and legal action if necessary.
- 10. <u>Continuous Improvement</u>: We regularly review and update our Anti-Corruption Policy to reflect changes in laws, regulations, and best practices. We seek to continuously improve our internal controls and processes to prevent corruption and foster a culture of integrity.

Implementation and Accountability:

BacTech Environmental is committed to maintaining the highest standards of ethics and integrity in all our business activities. Our Anti-Corruption Policy outlines our commitment to preventing corruption, bribery, and unethical conduct. By upholding these principles, we protect our reputation, ensure a level playing field, and contribute to a more transparent and sustainable business environment.

Document Control

Version	Approver	Approval date
No: 1.0	Board of Directors	May 30, 2023