

Sunsynk Anti Bribery and Corruption Policy 2025

Document Control

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Introduction

Sunsynk Group Limited (“Sunsynk”) consists of various subsidiary companies operating globally. At Sunsynk, we recognize that bribery and corruption are not only illegal but also unethical practices that undermine the rule of law, hinder economic progress, and negatively impact communities. As a multinational company, we are fully committed to preventing bribery, corruption and fraud, in all its forms, and to conducting our business, wherever it may occur, in a sustainable, socially responsible and ethical manner, with integrity and transparency. This Anti-Bribery and Corruption Policy is integral to that commitment, and it sets forth the standards we seek to uphold in our operations globally.

Definitions

- **Bribe:** Any offer, promise, or gift of money, goods, or services intended to influence the actions of an official or other person in a position of authority.
- **Corruption:** The abuse of entrusted power for private gain, which can occur in both the public and private sectors.
- **Entertainment:** Hospitality or other forms of social interaction provided to foster business relationships, which must be reasonable and not intended to influence business decisions.
- **Facilitation Payment:** A small payment made to expedite or secure the performance of a routine governmental action such as the issuing of permits, licenses, or other official documents; processing governmental papers such as visas and work orders; providing customs clearances; providing police protection; providing utility services; or handling cargo.
- **Gifts:** Any items of value or benefit exchanged at no cost.

- **Public Official:** Includes any: officers, employees or representatives of any national or local government institution; any person holding a legislative, administrative or judicial position of any kind; officers, employees or representatives of a public international organisation such as the United Nations, or World Bank; officers or representatives of a political party; or candidates for a political office.

Scope

This policy applies to all employees, directors, officers, and contractors under the supervision of Sunsynk worldwide. It extends to joint venture partners, who are expected to adhere to the same standards of conduct. We require all such parties to comply with this policy and to promote ethical practices within their own business operations.

Commitment

Sunsynk does not tolerate bribery, fraud or corruption of any kind. The following actions are strictly prohibited:

- Offering, authorising, soliciting, giving, or receiving of bribes or improper advantages is strictly prohibited. We never pay bribes, regardless of local custom or practice.
- Making facilitation payments, regardless of local customs or practices.
- Engaging in any form of corruption, whether directly or indirectly.

Policies, Practices and Controls

To manage and mitigate bribery and corruption risks, Sunsynk makes use of the following controls and adheres to the following policies and practices:

- **Dealings with Public Officials:** All interactions with public officials must be conducted transparently and in compliance with applicable laws.
- **Gifts and Entertainment:** Any gifts or entertainment provided or received must be appropriate, reasonable, infrequent, and not intended to influence business decisions or obtain any improper or undue advantage. Financial controls have been established to identify any breaches of this policy.
- **Sponsorships and Charitable Contributions:** These must be transparent, documented, and may not be used to gain improper advantages or to disguise a bribe. We ensure that before entering into sponsorships or making charitable contributions

we conduct risk-based due diligence and all donations of any size must be approved by the Chair, CEO and CFO of Sunsynk.

- **Political Contributions:** Sunsynk does not make political contributions and we do not seek to influence the political process by improper or corrupt means. To mitigate this risk, we do not contribute any funds or resources towards any political campaign, candidate or party. Any political activities engaged in by employees, directors, officers or Board members must be conducted strictly in their personal, private capacities, and kept separate from the company.
- **Business Partner Relationships:** We conduct due diligence on all joint venture partners to ensure they share our commitment to ethical practices.

Training and Awareness

- We will ensure that our senior management team takes the appropriate steps to effectively implement this policy (and related policies) in all areas of our business and all locations in which we operate.
- We will work closely with our employees and joint venture partners to continually assess and review our ethical, social, and environmental standards, with the aim of making ongoing adjustments and improvements in all three areas (environmental protection, social justice, and the combatting of bribery and corruption), as needed.

Joint Venture Partner Expectations

- We will make use of our Business Code of Conduct, the purpose of which is to procure, amongst other things, formal recognition of, and adherence to, our Anti Bribery and Corruption Policy. All joint venture partners will be required to sign our Business Code of Conduct, by which they will be expected to abide.
- We expect our joint venture partners to:
 - i. Understand and respect our responsible business policies, including this policy.
 - ii. Have read, understood, and agreed, in writing, to abide, at all times, by our Business Code of Conduct which embodies the principles set forth in our Responsible Business Policies, including this policy.
 - iii. Conduct business without payment or receipt of inducements, unlawful incentives, or other benefits that might be considered an attempt to influence decision-makers.

Record Keeping

Accurate record-keeping and transparency are essential to our anti-bribery and corruption efforts. All financial records must be maintained accurately and reflect the true nature of transactions. Sunsynk requires that all records be kept in accordance with these standards and all applicable laws and company policies.

Reporting and Compliance

Sunsynk encourages open communication and the reporting of any concerns related to bribery and corruption. Employees and associated parties are urged to report any suspected breaches of this policy. Sunsynk maintains a zero-tolerance policy for bribery and corruption and equally, for any retaliation against individuals who report such concerns in good faith. No person will be subjected to any adverse consequences for raising a concern provided they have not knowingly made a false report.

Consequences of Non-Compliance

Our Anti Bribery and Corruption Policy supports our values and reflects what is important to us. We take breaches of it seriously and any such breaches may result in disciplinary action, which may include warnings, suspension, or even termination of employment. Sunsynk also reserves the right to terminate relationships with joint venture partners who fail to comply with this policy or otherwise engage in illegal or unethical conduct.

Communication, Compliance, Monitoring and Review

This policy has been approved by the Chief Executive Officer and the Board and will be evaluated regularly to ensure its effectiveness and alignment with our commitment to ethical business practices.

The legal directors of each subsidiary will be jointly responsible for communicating the policy to the local management teams of all subsidiaries, who will in turn be responsible for the application, implementation and enforcement of the policy in their respective regions and with respect to the business activities engaged in by that subsidiary.

Any updates to this policy may be accessed via our website at www.sunsynk.org . We welcome any queries or input relating to our business policies and practices.