KRYSTALLINE SALT LIMITED

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Policy Statement

Krystalline Salt Limited conducts its business with integrity and is committed to its responsibility towards the society and all stakeholders in accordance with corporate governance principles, the company's Code of Conduct, as well as its stakeholder engagement policy and guidelines.

In order to provide clear guidelines for business operations and develop the Company into an organization of sustainability, Krystalline Salt Limited has adopted an Anti-corruption Policy and implemented it to ensure that the company has in place a policy that defines responsibilities, guidelines, and appropriate operational requirements to prevent corruption in all of Krystalline Salt Limited's business activities.

Krystalline Salt Ltd will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate.

Objectives

1. To set out guidelines, measures and procedures designed for the prevention and detection of corruption.
2. Outline responsibilities of all stakeholders with regards to anti-corruption measures in the company.
3. Promote transparency and accountability in all business activities.

Scope

This policy shall apply to all stakeholders of the company including:

- All Employees
- Customers/Clients
- Human Resource
- Board of Directors

1. The Board of Directors are responsible for establishing an anti-corruption policy and putting in place effective anti-corruption systems in order to ensure that Krystalline personnel recognize the significance of anti-corruption efforts and cultivate an anti-corruption mindset as part of the company's organizational culture.
2. All stakeholders should ensure, where applicable, their decisions, code of conduct and behavior is reflective of this policy.
3. All stakeholders should not engage in any activity that is considered unscrupulous for their betterment or the betterment of others. Such activities include:
    - Unfair promotion which is not based on merit or Key Performance Indicators
    - Unfair awarding of tenders or contracts based on prejudice, personal relations or favoritism
4. The use of Company funds, assets, or personnel for any unlawful, improper, or unethical purpose is strictly prohibited.
5. Stakeholders may not offer or give or promise anything of value to a government official with the intent to obtain or retain any business or any other advantage.
6. Stakeholders should not offer, promise or give directly or indirectly any commercial bribe to any person. Also, they should not receive a commercial bribe from any third party, such as a kick-back or other similar payment. For this purpose, a bribe is a payment or gift of any

value (or promise thereof) made to secure or reward the improper performance of an activity or an improper commercial advantage.

Definitions

Corruption:

Corruption refers to any types of bribery, whether in the form of offering, promising to give,giving, agreeing to give, requesting, or accepting money, assets, or other benefits to or from a government officer, a government agency, a private organization, or a responsible person, either directly or indirectly, in order that such person acts or refrains from acting in the exercise of his or her duties in order to obtain or retain business or recommend a specific business to the company, or obtain or retain other undue business advantages, except where such act is allowed by laws, rules, notifications, regulations, local customs, or business customs.

Bribery:

Bribery involves the exchange of something of value to secure an undue or unwarranted business advantage. Bribery can involve many different parties to a transaction, but it always involves at least two primary parties: the person who pays the bribe (the supply side) and the person who receives it (the demand side). Both raise serious ethical and legal issues and involve a breach of trust and duty by both parties.

Kickbacks:

Kickbacks are a scheme that arises when suppliers or service providers pay part of their fees to the individuals who give them the contract or some other business advantage.

Facilitation payments:

Facilitation payments are small payments to officials with a view to speeding up routine governmental transactions to which the payer is already entitled.

Rules of Practice

1. This Anti-corruption Policy shall also apply to human resource processes, including nomination or selection, promotion, training, evaluation, and remuneration. Supervisors at all levels shall communicate the policy to staff so that they can apply it to business activities within their scope of responsibility and supervise its implementation to ensure efficiency.
2. To ensure clarity regarding activities involving high risks of corruption, Krystalline Salt Limited personnel shall exercise caution and comply with the company's Code of Conduct and guidelines as follows:
    - **Donations or sponsorships**

      Offering of donations or sponsorships shall be transparent and legal. It must be made certain that such donations or sponsorship shall not be used as a pretext for bribery.
    - **Facilitation Payment**

      All facilitation payment to government employees is not encouraged
    - **Political Contributions**

      Krystalline Salt Limited shall maintain political neutrality and shall not act in the interest of or provide financial or other support to political parties, political coalitions, political figures, or political candidates, either directly or indirectly, either at the local, regional, or national level.

- **Business relations and procurement with the government**
  Any offering or accepting of bribery is prohibited in all business activities. Any dealing with the government shall be transparent, honest, and in compliance with relevant laws.

Employee Responsibilities

- As an employee they should never be involved in paying, requesting or receiving bribes or kickbacks.
- All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.
- Employees should not be involved in authorizing any corrupt activities or behaviours, nor turning a blind eye to potentially corrupt behaviour by subordinates or third parties acting on the Company's behalf.

Monitoring

This section of the policy covers three areas:

- How to raise a concern.
- What to do if you are a victim of bribery or corruption.
- Protection.

How to raise a concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to any of the activities carried out by Krystalline Salt, one is encouraged to raise concerns at an early stage as possible.

What to do if you are a victim of bribery or corruption

One must inform their immediate HOD as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

Protection

- In case one refuses to accept or offer a bribe or one report a concerns relating to potential act(s) of bribery or corruption, Krystalline Salt Limited understands that you may feel worried about potential repercussions.
- Krystalline Salt Limited will support anyone who raises concerns in good faith under this policy.
- Krystalline Salt Limited will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.
- Detrimental treatment refers to dismissal, disciplinary action, threats, or unfavorable treatment in relation to the concerns the individual raised.

Disciplinary Action

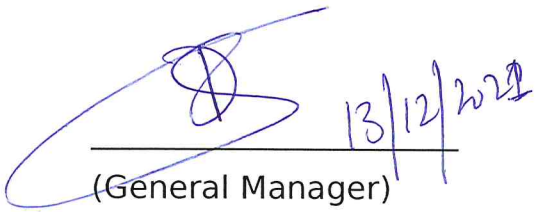
Any personnel who fail to comply with this policy are subject to disciplinary action and may also be subject to legal punishments if they commit an offense under the law.

Communication and Training

- Krystalline Salt Limited shall communicate and disseminate the Anti-corruption Policy to all stakeholders through various channels, such as orientation for new employees, training sessions or seminars, as well as internal public relations within our workplaces.
- The company shall also periodically communicate to stakeholders various forms of corruption, risks of being involved in corruption, and how to submit information. This is to ensure that all stakeholders acknowledge and implement the policy.
- Employees who have any inquiries about this policy may consult their supervisors, head of department or the human resource department.

Policy Implementation

This policy is hereby implemented. All business activities shall be conducted with respect to this policy from this day onwards.



13/12/2022

(General Manager)