

## Markono Anti-Bribery and Corruption Policy

### 1. Purpose

- 1.1 Markono Print Media Pte Ltd (“Markono”) is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices. The purpose of this manual is to:
- a) set out Markono’s policy against bribery and corruption; and
  - b) provide guidance to all Markono employees, wherever they are located, on recognising and dealing with bribery and corruption issues.

### 2. Our Policy

- 2.1 It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption.
- 2.2 All employees may not, directly or indirectly, offer, give, accept, or solicit anything of value to or from any third party in order to secure or reward an improper benefit or improper performance of a function or activity.
- 2.3 Prohibited payments or offers are impermissible at all times, whether or not they are given to a Government Official or an employee of a non-governmental business or entity, and regardless of whether they are given by another person or entity on behalf of the Company.
- 2.4 This policy extends to all of the company’s domestic and foreign operations, without exception, including operations conducted by any of Markono’s subsidiaries, affiliates, or other representatives and to the operations of any joint venture in which the Markono is a participant.
- 2.5 This policy should be read in conjunction with the Markono’s Employee Handbook.

### 3. Gifts and Entertainment

- 3.1 Giving and receiving gifts, as well as entertaining and being entertained, are accepted practice in many countries when negotiating or conducting business with third parties. However, if the value of the gift or entertainment becomes too large, it can affect, or be seen to affect, business judgment. It can also create expectations of special treatment.
- 3.2 All gifts and entertainment given or received must be of a reasonable value and appropriate to the business relationship in question. If you are not sure whether a gift or entertainment is of a reasonable value, you should discuss it with your manager.

#### **4. Guidance on Identifying Bribery**

- 4.1 This is a list of potential red flags scenarios which may raise concerns under anti-bribery and anti-corruption laws. Note that this list is intended to serve as examples and is not exhaustive.
- a) A Third Party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us
  - b) A Third Party requests payment in cash and/or refuses to sign a formal contract or to provide an invoice or receipt for a payment made.
  - c) A Third Party requests that payment is made to a country or geographic location different from where the third party resides or conducts business
  - d) A Third Party requests an unexpected additional fee or commission to “facilitate” a service or an RFP
  - e) A Third Party demands lavish entertainment, hospitality or gifts before commencing or continuing contractual negotiations or provision of services
  - f) A Third Party requests that a side payment (not an SLA credit for an SLA violation) be made to “overlook” potential legal violations
  - g) A Third Party requests that you provide employment or some other advantage to a friend or relative

#### **5. Record-keeping**

- 5.1 Employees must ensure all expenses claims relating to hospitality, gifts or entertainment are submitted to Finance in a timely and accurate manner. The reason for the expenditure must also be stated clearly.
- 5.2 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts will be kept “off-book” to facilitate or conceal improper payments.

#### **6. Reporting**

- 6.1 Any employee who is asked to provide or is offered anything of value in a manner that is prohibited by this Policy or suspects that another Company Employee, associated Person or anyone else is engaging in conduct that this Policy prohibits, must report it to a manager as soon as possible.
- 6.2 You may also email [whistleblower@markono.com](mailto:whistleblower@markono.com) to raise your concerns.

#### **7. Protection**

- 7.1 Those who refuse to accept or offer a bribe, or those who raise concerns or report another’s wrongdoing, are sometimes worried about possible repercussions. We aim to encourage

openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

- 7.2 Markono is committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in bribery or corrupt activities or because of reporting their suspicion in good faith that an actual or potential bribery or other corruption offence has taken place or may take place in the future.
- 7.3 If you believe that you have suffered any such treatment, please inform your manager or the whistleblower Committee at [whistleblower@markono.com](mailto:whistleblower@markono.com).

## **8. Monitoring and Review**

- 8.1 Markono will monitor the effectiveness and review the implementation of this policy, considering its suitability, adequacy and effectiveness. Improvements identified will be made as soon as possible.
- 8.2 Employees are invited to comment on this policy and suggest ways in which it might be improved through Markono's Voice platform.