



## ANTI-BRIBERY AND CORRUPTION AND ANTI-MONEY LAUNDERING POLICY

Adopted – October, 2023  
Last Updated – December, 2025

### ANTI-BRIBERY AND CORRUPTION AND ANTI-MONEY LAUNDERING POLICY

Zigma Global Environ Solutions Private Limited (“Zigma”) is a part of Blue Planet Group and falls under the category of Blue Planet Group Companies hence, Zigma has adopted Blue Planet’s ABC & AML Policies as being appended below:

#### **Introduction**

##### **Zero Tolerance Approach:**

Blue Planet Environmental Solutions Pte Ltd and all its subsidiaries, affiliate and group companies (herein after collectively referred to as “**Company**” or the “**Blue Planet Group**”) are committed to conduct all of its business in a professional, fair, and ethical manner. The Company adopts a zero-tolerance approach to bribery and corruption of any form and commits to adopt ethical business practices which are reflected in this policy on Anti-Bribery and Corruption, Gifting and Hospitality, and Anti-Money Laundering (“**Policy**”).

The Company does not offer or pay or accept any bribes for any purpose whether directly or through a third party. This applies to domestic and foreign governments, as well as to all private parties.

Bribery is a serious criminal offence in countries in which the Company operates, including Singapore, India, Malaysia, UK, Vietnam and others. Bribery offences can result in the imposition of severe fines and/or custodial sentences (imprisonment), exclusion from tendering for public contracts, and severe reputational damage.

The Company is committed to undertaking periodic bribery and corruption risk assessments across its business to understand the bribery and corruption risks it faces across jurisdictions and ensure that it has adequate procedures in place to address those risks.

The risk assessment will be documented and periodically reviewed and updated, and the appropriate committee of the Company be updated in accordance with applicable regulations.

Covered Persons (*as defined below*) must conduct their activities in full compliance with this Policy, the Chapter 241 of Singapore, Singapore Corruption Act, Drug Trafficking and Other Serious Crimes Act 1992, laws of the India and all applicable anti-corruption laws, including the Prevention of Corruption Act, 1988, Prevention of Money Laundering Act, 2002, Malaysian Anti-Corruption Commission Act 2009, Malaysia Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001, the United States Foreign Corrupt Practices Act of 1977 or any other applicable anti-bribery or anti-corruption law (including without limitation Part 12 of the United States Anti-Terrorism, Crime and Security Act of 2001, the United States Money Laundering Control Act of 1986; the United States International Money Laundering Abatement and Anti-Terrorist Financing Act of 2001, Prevention of Corruption Act, Vietnam Anti-Corruption Law and Decree 59/2019, UK Bribery Act 2010).

#### **Scope:**

This Policy is applicable to all individuals working at all levels and grades, including directors, senior managers, officers, other employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, interns, seconded staff, casual workers and agency staff, agents, or any other person associated with the Company (“**Covered Persons**”). The Company shall also ensure on best efforts basis that any third party including, but not limited to vendors, clients, and customers that it has engaged on its behalf, also adopt this policy or any other policy with similar safeguards.

This Policy is applicable with effect from 28<sup>th</sup> October 2023 and supersedes all prior policies and communication on this subject.

#### **1. Bribery / Corruption:**

1.1 A bribe or corrupt action includes the receiving, offering, promising, requesting, authorizing, or providing of a



## ANTI-BRIBERY AND CORRUPTION AND ANTI-MONEY LAUNDERING POLICY

Adopted – October, 2023  
Last Updated – December, 2025

financial or non-financial advantage or “anything of value” to any client, customer, business partner, vendor or other third party in order to secure, induce or keep an improper or unfair advantage or misuse an individual’s position.

1.2 Anything of value is not only cash and includes (but not limited to) cash equivalents like gifts, services, employment offers, loans, travel (except business travel as covered under sub-clause 2.2) and hospitality (except for business purposes as covered under sub-clause 2.2), charitable donations, sponsorships, business opportunities, favourable contracts or giving anything even if nominal in value. Please note that “**hospitality**” would mean and include any form of facility extended like, hotel accommodation, food, drinks, entertainment, or any events (participating or watching) such as sporting events, theatrical events, concerts, awards or ceremonies.

1.3 Any and all expenditure incurred by the Company towards cash equivalents like gifts, services, employment offers, loans, travel (except business travel as covered under sub-clause 2.2) and hospitality (except for business purposes as covered under sub-clause 2.2), charitable donations, sponsorships, business opportunities, favourable contracts or giving anything even if nominal in value should be duly accounted and recorded in writing in the books of accounts. Such payments or expenditure should at all times be brought to the notice of the CCO / CO along with receipts.

1.4 There is a presumption of corrupt intent if financial or non-financial favours are made or anything of value is given to employees of, or persons dealing with the government, under relevant laws where the company does business.

1.5 Bribes could include the following examples:

- (a) Lavish gifts, entertainment or travel expenses, particularly where they are disproportionate, frequent or provided in the context of on-going business negotiations;
- (b) Cash payments by employees or third persons such as consortium members, introducers or consultants;
- (c) Uncompensated use of Company services, facilities or property;
- (d) Loans, loan guarantees or other extensions of credit;
- (e) Providing a sub-contract to a person connected to someone involved in awarding the main contract;
- (f) Engaging a local company owned by or offering an educational scholarship to a member of the family of a potential customer/ public or government official;
- (g) Political or charitable donations made to a third party linked to, or at the request of, someone with whom the Company does business.

1.6 Facilitation payments are strictly prohibited. These include any irregular one-time and/or routine payments made to government officials to expedite or secure routine governmental action. Any such payments must immediately be brought to the attention of the Chief Compliance Officer (“CCO”) or Compliance Officer (“CO”), as applicable to a Blue Planet Group entity. The details of such persons are as provided below:

Name	Designation	Email Address	Location
Mr. Dhananjay Jitesh Pandey	Group Compliance Officer	<a href="mailto:dhananjay.pandey@blue-planet.com">dhananjay.pandey@blue-planet.com</a>	New Delhi, India

1.7 No person who is subject to this Policy shall:

- (a) Offer, provide, or authorize, a bribe or anything which may be viewed as a bribe either directly or indirectly or



otherwise through any third party; and/or

(b) Request or receive a bribe or anything which may be viewed as a bribe either directly or indirectly or otherwise through any third party, or perform their job functions improperly in anticipation, or in consequence, of a bribe.

1.8 The prohibition on accepting a bribe from, or giving a bribe to, any person applies to any person acting in the course of a business, as an employee of a business or otherwise on behalf of others in relation to the performance of their duties and to public officials.

1.9 The Company prohibits the provision of money, gifts, entertainment or anything else of value except the amounts as agreed and stipulated under this Policy, to any government or public officials or private entity for the purpose of influencing such officials or private entity in order to obtain or retain business or a business or commercial advantage, or otherwise in relation to decisions that may be seen as beneficial to the Company's business interests.

1.10 Examples of government and public officials include:

- (a) Anyone holding a legislative, administrative or judicial position, including government ministers, elected representatives of national, regional or local assemblies, officials of a political party, civil servants, magistrates or judges;
- (b) An employee, officer, agent or other person acting in an official capacity for a government, government department, government or public agency, public enterprise, or commercial enterprise owned in whole or in part by a government;
- (c) An employee, officer, agent or person acting in an official capacity for a public international organization, such as the World Bank, United Nations or the European Commission.

**1.11 Compliance:**

(a) All Covered Persons and board of directors of the Company, and all third parties who represent the Company, or who are suppliers, vendors, clients, contractors or other business partners are required to comply with this Policy, and not engage in any form of bribery or corruption.

(b) The Company runs a risk of being held responsible for the actions of a third party (who represents the Company, or who are the suppliers, vendors, clients, contractors or other business partners) acting on its behalf. Hence, due care must be taken to ensure that those third parties do not engage or attempt to engage in bribery.

(c) The CCO or the CO of the Company shall ensure that:

(i) All records are accurate, complete and accessible for review, including records relating to commissions, travel and entertainment. This Policy prohibits any practice that might conceal or facilitate bribery or any other corrupt action;

(ii) Covered Persons must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are recorded and specifically record the reason for the expenditure;

(iii) 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;

(iv) No accounts will be kept "off-book" to facilitate or conceal improper payments and the same is ensured



through effective monitoring and auditing mechanisms in place; and

(v) Due diligence is undertaken before engaging any third-party above prescribed thresholds and that the Vendor Engagement SOP is given effect to.

(d) Specific guidance on common forms of bribery:

(i) Gifts and hospitality, travel and entertainment: It is the responsibility of the person extending or receiving such a gift, hospitality or travel and entertainment benefit to ensure that it is not a bribe and is in strict compliance with the Policy.

(ii) Charitable contributions: Covered Persons must not use charitable contributions as a way of concealing a bribe.

(iii) Political contributions: Covered Persons must not use the Company's resources including funds or facilities to provide support for, or contribute to any political organisation or candidate as the Blue Planet Group is strictly apolitical.

#### **1.12 Reporting**

(a) The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Company or under the Company's control.

(b) Covered Persons must notify the CCO / CO and the legal team as soon as possible if they believe or suspect that a breach of or conflict with this Policy has occurred or may occur in the future.

(c) If a Covered Person is unsure whether a particular act constitutes bribery or corruption or if he/she has any other queries, these should be raised with their respective manager, the HR team, the Legal team and the CCO / CO.

(d) Employees who report potential misconduct in good faith or who provide information or otherwise assist in any inquiry or investigation of potential misconduct will be protected against retaliation.

## **2. Gifts, Meals, Entertainment and Employment**

This Policy sets forth various rules relating to gifts, entertainment, travel, meals, lodging and employment. All such expenditures must be recorded accurately in the books and records of the Company, as outlined below.

### **1. Gifts**

(a) As a general matter, the Company competes for and earns business through the quality of its personnel, products and services, not with gifts or lavish entertainment. The use of the Company funds or assets for gifts, gratuities, or other favours to government officials or any other individual or entity (in the private or public sector) that has the power to decide or influence the Company's commercial activities is prohibited, unless all of the following circumstances are met.

(i) the gift does not involve cash or cash equivalent gifts (e.g., gift cards, store cards or gambling chips);

(ii) the gift is permitted under both applicable law and the guidelines of the recipient's employer (provided this has been duly shared with the Company by the recipient's employer);

(iii) the gift is presented openly with complete transparency;



- (iv) the gift is properly recorded in the Company's books and records;
- (v) the gift is provided as a token of esteem, courtesy or in return for hospitality and should comport with local custom; and
- (vi) the item costs less than INR 8,000 (or its foreign currency equivalent).

(b) Gifts that do not fall specifically within the above guidelines require advance consultation and approval by the CCO or CO.

(c) Note that the provision of gifts, as well as the reporting requirements, in this Policy, apply even if the Company is not seeking reimbursement for the expenses (i.e., paying these expenses out of your own pocket does not avoid these requirements).

(d) The Company must not accept, or permit any member of his/her immediate family to accept any gifts, gratuities or other favours from any customer, supplier or other person doing or seeking to do business with the Company, other than items of up to INR 8,000 or such other amount as may be decided by the Company or edible items that are customarily acceptable (e.g., sweets or chocolates). Any gifts of a value exceeding INR 8,000 should be returned immediately and reported to the manager of the concerned the Company. If immediate return is not practical, they should be given to the Company for charitable disposition.

## **2 . Meals, Entertainment, Travel and Lodging**

(a) Common sense and moderation should prevail in business entertainment and the payment of travel and lodging expenses engaged in on behalf of the Company. Covered Persons should provide business entertainment to or receive business entertainment from anyone doing business with the Company only if the entertainment is infrequent, modest, and intended to serve legitimate business goals.

(b) Meals, entertainment, travel or lodging should never be offered as a means of influencing another person's or entity's business decision. Meals, entertainment, travel or lodging should only be offered if it is appropriate, reasonable for promotional purposes, offered or accepted in the normal course of a business relationship, and if the primary subject of discussion or purpose is business. The appropriateness of a particular type of meal, entertainment, travel or lodging depends upon both the reasonableness of the expense and on the type of activity involved. This is determined based on whether or not the expenditure is sensible and proportionate to the nature of the individual involved.

(c) Expenses for meals, hospitality, travel or lodging for government officials or any other individual or entity (in the private or public sector) that has the power to decide or influence the Company commercial activities may be incurred without prior written approval by CCO / CO only if all of the following conditions are met:

- (i) The expenses are bona fide and related to a legitimate business purpose and the events involved are attended by appropriate Company representatives;
- (ii) The cost of the meal, hospitality, travel or lodging expenses are reasonable and proportional to the business purpose and are not extravagant; and
- (iii) The meal, hospitality, travel or lodging is permitted by the rules of the recipient's employer as shared with the Company.



(d) All expense reimbursements must be supported by receipts, and expenses and approvals must be recorded in sufficient detail in the Company's records. In all instances, the Company must ensure that the recording of the expenditure associated with meals, lodging, travel or entertainment clearly reflects the true purpose of the expenditure.

(e) Note that the provision of meals, entertainment, travel or lodging as well as the reporting requirements in this Policy apply even if the Company are not seeking reimbursement for the expenses (i.e., paying these expenses out of their own pocket does not avoid these requirements).

(f) When possible, meals, entertainment, travel or lodging payments should be made directly by the Company to the provider of the service and should not be paid directly as a reimbursement. Per diem allowances may not be paid to a government official or any other individual (in the private or public sector) that has the power to decide or influence the Company's commercial activities for any reason.

(g) Any meal, hospitality, travel or lodging expense greater than [INR 8,000] (or its foreign currency equivalent) per person, and any expense at all that is incurred for meals, entertainment, travel or lodging unrelated to a legitimate business purpose, or which in any way deviates from the requirements of clause 2.2, must be pre-approved in writing by the CCO or CO.

(h) Please note that in addition to traditional gifts, meals, entertainment, lodging, and travel that are provided to business relationships (individuals and/or entities that the Company interacts with on a professional level or has any business dealings with or transacts any business with) where the Company are not in attendance shall be considered gifts, and subject to the rules and requirements for gifts specified in this Policy.

### **3 . Relationships with Third Parties**

(a) Anti-corruption laws prohibit indirect payments made through a third party, including giving anything of value to a third party while knowing that value will be given to a government official for an improper purpose. Therefore, the Company should avoid situations involving third parties that might lead to a violation of this Policy.

(b) The Company who deals with third parties are responsible for taking reasonable precautions to ensure that the third parties conduct business ethically and comply with this Policy. Such precautions may include, for third parties representing the Company before governmental entities, conducting an integrity due diligence review of a third party, inserting appropriate anti-corruption compliance provisions in the third party's written contract, requiring the third party to certify that it has not violated and will not violate this Policy and any applicable anti-corruption laws during the course of its business with the Company, and monitoring the reasonableness and legitimacy of the services provided by and the compensation paid to the third party during the engagement. Any doubts regarding the scope of appropriate due diligence efforts in this regard should be resolved by contacting the CCO or the CO.

(c) If the Company have reason to suspect that a third party is engaging in potentially improper conduct, they shall report the case to CCO or Co, immediately. The Company shall investigate and stop further payments to the third party if the Company suspicions are verified through the investigation.

### **3. Anti-Money Laundering**

#### **3.1 Money Laundering**

(a) The offence of money laundering is directly or indirectly attempting to indulge or knowingly assisting, or if the Company knowingly is a party or is actually involved in any process or activity connected with the proceeds of crime and projecting it as untainted property. In a general sense, money laundering is used to describe the process by which



offenders disguise the original ownership and control of the proceeds of criminal conduct by making such proceeds appear to have derived from a legitimate source.

(b) Money laundering usually consists of 3 components:

(i) Placement: This is the initial stage and during this stage, the money generated from illegal / criminal activity such as sale of drugs, illegal firearms, etc. is disposed of. Funds are deposited into financial institutions or converted into negotiable instruments such as money orders or traveller's cheques.

(ii) Layering: In this stage, funds are moved into other accounts in an effort to hide their origin and separate illegally obtained assets or funds from their original source. This is achieved by creating layers of transactions, by moving the illicit funds between accounts, between businesses, and by buying and selling assets on a local and international basis until the original source of the money is virtually untraceable. Thus, a trail of unusually complex transactions is created to disguise the original source of funds and thereby make it appear legitimate.

(iii) Integration: Once the illegitimate money is successfully integrated into the financial system, these illicit funds are reintroduced into the economy and financial system and often used to purchase legitimate assets, fund legitimate businesses, or conduct other criminal activity. The transactions are made in such a manner so as to appear as being made out of legitimate funds.

### **3.2 Potential Red Flags**

(a) Where any suspicions arise that criminal conduct may have taken place involving a customer, colleague or third party, an employee should consider whether there is a risk that money laundering or terrorist financing has occurred or may occur, and to report the same to the CCO.

(b) Some examples of red flags to be reported include:

(i) A customer or partner provides insufficient, false or suspicious information or is reluctant to provide complete Information;

(ii) Methods or volumes of payment that are not consistent with the payment policy or that are not customarily used in the course of business, e.g., payments with money orders, traveller's checks, and/or multiple instruments, and payments from unrelated third parties;

(iii) Receipts of multiple negotiable instruments to pay a single invoice;

(iv) Requests by a customer or partner to pay in cash;

(v) Early repayments of a loan, especially if payment is from an unrelated third party or involves another unacceptable form of payment;

(vi) Orders or purchases that are inconsistent with the customer's trade or business;

(vii) Payments to or from third parties that have no apparent or logical connection with the customer or transaction;

(viii) Payment to or from countries considered high risk for money laundering or terrorist financing;

(ix) Payments to or from countries considered to be tax havens or offshore jurisdictions which appear on any sanctions lists;



- (x) A customer's or partner's business formation documents are from jurisdictions which appear on any sanctions lists of the United States of America (<https://sanctionssearch.ofac.treas.gov/>), or a country that poses a high risk for money laundering, terrorism or terrorist financing, or a country that is not logical for the customer;
- (xi) Overpayments followed by directions to refund a payment, especially if requested to send the payment to a third party;
- (xii) Unusually complex business structures, payment patterns that reflect no real business purpose.

### **3.3 Due Diligence and Compliance**

The due diligence obligations under this Policy are as follows:

- (a) To on board any vendors / third parties in accordance with the Blue Planet Vendor Engagement SOP.
- (b) To identify and discourage money laundering or terrorist financing activities, and immediately communicate any suspicion of such activities to the CCO / CO.
- (c) To take adequate and appropriate measures to follow the spirit of applicable anti-money laundering legislation.

### **3.4 Reporting Obligation**

- (a) Employees have the obligation to read and follow this Policy, to understand and identify any red flags that may arise in their business activities and to escalate potential compliance concerns related to this Policy to the CCO / CO and Legal team, without notifying anyone involved in the transaction.
- (b) In the event that any Covered Person or anyone who has a business relationship with the Company, violates this Policy, the contract or business relationship with the said contractor, vendor or business partner shall be terminated.

## **4. General**

- 4.1. All reports, complaints, doubts, or concerns in relation to this Policy shall be raised to the CCO / CO. Any action required to be undertaken under this Policy shall be taken by the CCO / CO in accordance with this Policy.
- 4.2. The ESG Committee is responsible for monitoring the use and effectiveness of this Policy. The CCO / CO shall report to the ESG Committee.
- 4.3. The CCO / CO is responsible for:

- (a) Ensuring that this Policy complies with the Company's legal and ethical obligations and that all Covered Persons under the respective sectors, function or line of business are aware of and comply with the Policy. All Covered Persons must receive regular messages (oral /written) from the line management reminding them to comply.
- (b) Ensuring that the Company has a culture of compliance and effective controls to comply with ABAC and AML laws and regulations to prevent, detect and respond to bribery, corruption, money laundering and counter-terrorism financing and to communicate the serious consequences of non-compliance to employees and other Covered Persons.



(c) Annual trainings (both in English and relevant local vernacular) being conducted for relevant employees regarding this Policy and general compliance with anti-bribery and anti-corruption and anti-money laundering obligations.

4.4. Covered Persons are encouraged to exercise their right under the Policy to disclose any suspected activity or wrong-doing. All Covered Persons in the sector, function or line of business are referred to the Company's Whistleblower hotline to report the same.

**4.5. Consequences of Violation:**

(a) Any employee who breaches this Policy will face disciplinary action as prescribed under the Employee Handbook Manual, which could result in dismissal. Failure to report a violation of this Policy constitutes an independent violation of this Policy that is subject to disciplinary action, up to and including termination of employment.

(b) Breach by any other Covered Person may result in the Company pursuing legal remedies against such Covered Person and/or immediate termination of contract with such Covered Person. Additionally, the Blue Planet Group may also be exposed to criminal or civil claims and reputational harm arising from the violation.

(c) Any breach of this Policy would also result in imposition of large fines / imprisonment on the Covered Person / Company.

4.6. **Monitor and Review:** This Policy will be annually reviewed and updated as needed to ensure it continues to be adequate and effective.

*The Company's policies do not constitute contracts for employment with the Company either express or implied. The Company reserves the right at any time to delete or add to any provisions of this policy at its sole discretion. However, deletions or additions to this policy may only be made in writing by the Human Resources department. Where there is inconsistency between this policy and procedure and applicable local law, local law will prevail.*

\*\*\*