



FORGE CHEMICALS ANTI-BRIBERY & CORRUPTION PREVENTION POLICY

Forge Chemicals (PTY) Ltd – Anti-Bribery & Corruption Prevention Policy

At Forge Chemicals, we are committed to conducting our business ethically, transparently, and in full compliance with all applicable anti-bribery and anti-corruption laws. This policy reinforces our zero-tolerance stance on bribery and corruption in any form, across all countries and jurisdictions where we operate.

1. Purpose

The purpose of this policy is to:

- Prevent, detect, and address bribery and corruption in all Forge Chemicals activities
- Ensure compliance with applicable anti-corruption laws and regulations
- Promote a culture of integrity and ethical conduct across our global operations
- Guide employees, agents, suppliers, and business partners in identifying and handling risks related to bribery and corruption

2. Scope

This policy applies to:

- All employees, directors, officers, and representatives of Forge Chemicals Limited
- Third parties acting on behalf of the company, including agents, consultants, contractors, distributors, and joint venture partners

3. Definitions

- **Bribery:** Offering, giving, receiving, or soliciting anything of value to improperly influence a business or governmental decision.
- **Corruption:** The abuse of entrusted power for private gain, including fraud, extortion, nepotism, kickbacks, and embezzlement.

4. Policy Requirements

Prohibition on Bribery

- No one at Forge Chemicals may offer, pay, promise, request, or accept bribes or facilitation payments, whether directly or indirectly.
- This applies to interactions with public officials and private entities alike.

Gifts & Hospitality

- Reasonable and proportionate gifts or hospitality may be allowed, but must never be intended to influence a decision.
- Any gift or hospitality must be recorded transparently and approved according to internal guidelines.

Third-Party Due Diligence

- All third parties must undergo appropriate due diligence to assess risks of bribery or corruption.
- Contracts must include anti-bribery clauses and expectations for ethical conduct.

Books & Records

- Accurate, complete financial records must be maintained.
- Off-the-books accounts, false entries, or undisclosed transactions are strictly prohibited.

Reporting Concerns

- All employees are encouraged to report any concerns or suspicions regarding bribery or unethical conduct.
- Reports can be made anonymously and will be investigated thoroughly without retaliation.

5. Training & Awareness

Forge Chemicals provides regular training to all employees and relevant third parties to ensure awareness of this policy and how to comply with it. Updated policies and case examples are shared as part of ongoing ethical education.

6. Monitoring & Enforcement

- Compliance with this policy is monitored through internal audits and risk assessments.
- Violations of this policy may result in disciplinary action, including termination of employment or contracts, and legal consequences.

This policy is endorsed and fully supported by Forge Chemicals' executive management and reflects our unwavering commitment to ethical business practices and clean, transparent trade.