

# **Anti-Bribery, Corruption & Whistleblower Policy**

## **POLICY STATEMENT**

WorkSmartly Group of Companies ('Worksmartly') is committed to conducting business ethically and honestly, and has a zero-tolerance policy to non-compliance/ breaches with regulatory obligations and laws especially bribery and corrupt activities. We are steadfast in all business dealings and relationships and will always strive to adhere to all laws relating to anti-bribery and anti-corruption.

## **SCOPE OF POLICY**

The provisions enshrined in this policy apply to all WorkSmartly employees, whether permanent, fixed-term or temporary, basis and stakeholders, which include current or potential customers, vendors, agents, business partners, consultants, outsourced personnel and other representatives, amongst others.

This policy is an extract of the existing and implemented WorkSmartly Anti Bribery & Corruption Policy and Procedure (ABCPP) and sets forth WorkSmartly's minimum compliance standards concerning interactions with third parties. However, where local law and regulations require more stringent controls, then such stricter controls must be followed.

## **DEFINITION OF BRIBERY AND CORRUPTION**

Bribery refers to "offering, promising, giving or soliciting of undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties" and Corruption is the abuse of entrusted power for private gain.

## **FIGHTING BRIBERY, CORRUPTION AND UNETHICAL PRACTICES**

### **1. Solicitation, Bribery and Corruption**

Employees are prohibited from, directly or indirectly, soliciting, accepting or obtaining or agreeing to accept or attempting to obtain, from any party for themselves or for any other party, any bribe or gratification as an inducement or a reward for doing or forbearing to do, or for having done or forborne to do, any act in relation to Worksmartly's affairs or business, or for showing favour or forbearing to show disfavour to any party in relation to WorkSmartly's affairs or business.

### **2. Facilitation Payments**

Employees are prohibited from, directly or indirectly, accepting or obtaining or attempting to accept or obtain facilitation payments from any person for themselves or for any other person subject to this policy. The term "facilitation payments" generally means payments

made to secure or expedite the performance by a person performing a routine, necessary or administrative duty or function.

### **3. Prohibition on Commissions, Discounts and Secret Profits**

Employees must not, directly or indirectly, receive or obtain, in respect of any goods or services purchased or other business transacted (whether or not by them) by or on behalf of WorkSmartly, any discount, rebate, commission, service, interest, consideration of value or other benefit or payments of any kind (whether in cash or in kind) which is not authorised by WorkSmartly's Anti-Bribery & Corruption policies and/or procedures.

### **4. Receiving Gifts and Entertainment**

WorkSmartly prohibits employees from offering, soliciting or receiving any gifts or hospitality in any form, to or from any and/or all stakeholders, either directly or indirectly which may influence the employee's judgment in a decision-making process or put the employee in a position of conflict.

### **5. Dealing with Government Officials**

Any giving or receiving directly or indirectly of, kickbacks or gratuities to/ from government officials is not allowed. Due care and diligence must be exercised at all times when dealing with government officials or related associated persons.

### **6. Political Contributions**

WorkSmartly does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office.

### **7. Sponsorships and Donations**

WorkSmartly is practicing a general principle that to accept or give any form of sponsorships or donations will be prohibited unless they are made or conducted in a good faith to show reasonableness with a modest value. In accordance with WorkSmartly's commitment to contribute to the community coupled with its values of integrity and transparency, all sponsorships and donations must comply with the following:

- Ensure such contributions are allowed by applicable laws;
- Obtain all the necessary approval/authorisations;
- Be made to well-established entities with an adequate organisational structure to guarantee the proper administration of the funds;
- Be accurately stated in the company's accounting books and records; and
- Not to be used as a means to cover up an undue payment or bribery;

### **8. Third-Party/ Business Associates Relationship**

All employees are required to exercise due care and due diligence at all times when dealing with third-parties/ business associates and ensure their affairs do not involve any form of corrupt practices, perceived or actual including having the Third Party / Business Associates sign the Anti Bribery and Corruption Declaration Form.

## **REPORTING OF POLICY VIOLATIONS AND WHISTLEBLOWING**

Recognising the above mentioned values, WorkSmartly provides an avenue for all employees of WorkSmartly, members of the public and stakeholders to disclose any improper conduct within WorkSmartly.

Any and/or all queries, reports and disclosures of knowledge and/or suspicion of improper conduct /violation of policy are to be made to [hello@worksmartly.com](mailto:hello@worksmartly.com).

No individual will be discriminated against or suffer any sort or manner of retaliation for raising genuine concerns or reporting in good faith on violations or suspected violations of the policy or for refusing to engage in prohibited conduct. All reports will be treated confidentially.

Should you require further clarification with regards to this policy, you can email your queries to [hello@worksmartly.com](mailto:hello@worksmartly.com).

Please note that this policy may be amended, enhanced or updated from time to time. We would advise you to check our website from time to time for any amendments, enhancements or updates to this policy. By continuing to, access our website, communicate with us or use our services subsequent to any amendments or updates to this notice, you confirm your acknowledgement and acceptance of the amendments to this policy.