



ANTI-CORRUPTION POLICY

main provisions

This policy outlines our commitment to conducting business with integrity, transparency, and in full compliance with all applicable laws and regulations.



May, 2024.

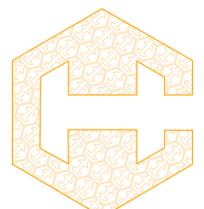
INTRODUCTION



Helmchron conducts its business operations in compliance with both legal requirements and ethical principles, firmly rooted in our core values and industry regulations. We are committed to cultivating and upholding a culture of integrity and high ethical standards across all aspects of our operations.



Integrity, as one of our fundamental values, means we don't accept any form of unethical behavior, including corruption. We consistently adhere to regulations, industry standards, and best practices, while standing up for what is right and taking responsibility for our actions. By demonstrating integrity, we build strong relationships with our stakeholders and enable long-term success.



HELMCRON

Chemistry Connects Us



HIGHEST ETHICAL STANDARDS

We are firmly committed to upholding the highest ethical standards in our business conduct. Our primary focus is on ensuring compliance with applicable local and international anti-corruption and anti-bribery laws, regulations, and industry best practices.

We categorically reject all manifestations of corrupt business conduct, including bribery (public and private, active and passive), embezzlement, fraud, theft, and the procurement or reception of unjust advantages. An improper advantage encompasses anything of value, including but not limited to payments, meals, gifts, entertainment, travel expenses, or fictitious agreements.





BASIC ANTI-CORRUPTION PRINCIPLES



1

Embracing uncompromising ethical standards, emphasizing integrity and transparency in all operations and interactions, is the representation of Helmchron way of work.

2

Adhering strictly to all applicable laws and regulations related to anti-corruption, bribery, and unethical behavior is paramount.

3

Under no circumstances should any team member provide, promise to provide, or offer anything of value to any individual, whether directly or through intermediaries, to influence decisions or actions of that individual or the organization they represent, with the intent of securing an unfair advantage or acquiring or retaining business.

4

Zero-tolerance towards any form of corruption, bribery, extortion, or unethical conduct, regardless of the ones position should be maintained at all times. We explicitly prohibit the provision, offering, solicitation, or acceptance of bribes or any improper advantages, whether conducted directly or indirectly.

5

If any team member becomes aware of any instances of bribery, corruption, or fraudulent activities, it is their personal responsibility to promptly report them to the compliance officer. All reports are treated with strict confidentiality and anonymity, as per preference.



POTENTIAL RAMIFICATIONS

Involvement in corruption can lead to serious consequences for Helmchron and individuals:

- **Legal ramifications** - lawsuits, fines, and regulatory penalties if found complicit in corrupt practices
- **Reputational damage** - losing trust among stakeholders such as clients and partners
- **Loss of business opportunities** - losing contracts, partnerships, and market credibility, leading to diminished growth prospects
- **Employee morale and turnover** – enabling a toxic work environment, demoralizing employees and potentially leading to increased turnover rates
- **Long-term sustainability** - long-term sustainability and success of the business is jeopardized



PERSONAL RESPONSIBILITY



IMPORTANT

All team members must exercise good judgment and avoid situations that may create a perception of impropriety or influence over business decisions. Each of us bears personal responsibility for adhering to anti-corruption standards, and no senior employee has the authority to make us engage in unethical behavior. Additionally, we should always keep in mind that our behavior impacts and reflects Helmchron as a whole.





SUPPORT

For any questions related to anti-corruption policy and principles, please refer to [compliance officer](#).

Helmchron reserves the right to update or amend this policy as necessary to reflect changes in laws, regulations, or business practices.

