



ANTI BRIBERY AND CORRUPTION POLICY

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The policy provides clarity on company expectations regarding potential bribery and corruption in the course of employees' daily activities on their different roles. To ensure every employee and individual acting on Company's behalf is responsible for conducting company business honestly and professionally.

- This policy is applicable to all employees working in UGEE Ibadan Plant.
- It is mandatory that all employees of UGEE chemicals understand and comply to this policy at all times
- The HR Managers is responsible for reinforcing adherence, challenging and investigating non-compliance.
- UGEE Chemicals Limited is committed to applying the highest standards of ethical conduct and integrity in its business activities. Company considers that bribery and corruption have a detrimental impact on business by undermining good governance and distorting free markets.
- Company benefit from carrying out business in a transparent and ethical way and by helping to ensure that there is honest, open and fair competition in our sectors. Company does not tolerate any form of bribery by, or of, its employees or any persons or companies acting for it or on its behalf.
- The site leaders and senior management are committed to implementing and enforcing effective systems to prevent, monitor and eliminate bribery.
- Employees and others acting for or on behalf of Company are strictly prohibited from making, soliciting or receiving any bribes or unauthorized payments. As part of its anti-bribery measures, Company is committed to engage only in transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure.
- A breach of Company Anti-Bribery policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct and immediate dismissal.

The success of Company anti-bribery measures depends on everyone playing their part in helping to detect and eradicate bribery.

Therefore, all employees and others acting for, or on behalf of Company are encouraged to report any suspicious practice. Company Board will support any individuals who make such a report in good faith and keep his/her name anonymous.

Signed: HR Manager

Date: Feb 28, 2025

