



1. Policy Statement

Hargy Oil Palms Ltd (HOPL), a subsidiary of SIPEF, is committed to the highest standards of ethical conduct, transparency, and corporate governance. HOPL maintains a strict zero-tolerance stance against all forms of corruption and bribery.

This Policy applies to all employees, board members, contractors, and relevant stakeholders and reinforces our commitment to integrity, fairness, and compliance with national and international laws.

2. Purpose

The purpose of this Policy is to establish a clear framework that guides ethical behaviour and decision-making, aims to prevent and eliminate corruption and bribery, promotes transparency, accountability, and integrity, and ensures compliance with all relevant legal and regulatory requirements.

3. Scope

This Policy applies to all individuals working for or on behalf of HOPL, including board members, employees, contractors, suppliers of goods and/or services and non-employees. It outlines the standards of conduct expected of all personnel associated with the organisation.

4. Standard Operating Procedures

While this Policy establishes HOPL's standards for ethical conduct, transparency, and corporate governance, the detailed guidance on definitions, implementation, and the management of policy breaches is provided in the corresponding Standard Operating Procedure (SOP).

5. Responsibilities

Management is expected to lead by example, fostering a culture of ethics and integrity, and ensuring compliance through continuous monitoring and regular audits.

All employees are required to participate in annual anti-corruption and anti-bribery training.

6. Prohibited Conduct

HOPL strictly prohibits all forms of corruption and bribery, including embezzlement, extortion, and misuse of authority. Employees and stakeholders must not offer, give, receive, or solicit bribes, commissions, or kickbacks in any business dealings, including with public officials or government bodies.

Gifts, hospitality, or donations are only allowed if modest, infrequent, and free from any undue influence, with prior approval from the General Manager and proper disclosure. Additionally, HOPL does not permit any form of political contributions to avoid influencing political decisions.

7. Reporting Violations

It is the responsibility of all employees and stakeholders to report any actual or suspected violations of the Policy.

All employees are required to report any known or suspected incidents of corruption or bribery via:

- **Email:** pg.sm.tokaut@sipef.com
- **Tokaut Boxes:** Located at various HOPL sites

Reports will be handled confidentially under the HOPL Whistleblower Policy. HOPL guarantees protection from retaliation for any employee who, in good faith, reports misconduct. All parties involved in whistleblowing processes must maintain strict confidentiality.

8. Penalties for Violations

Any breach of this Policy may result in disciplinary action, including termination of employment.

Serious violations may also lead to civil or criminal prosecution, including fines and imprisonment under applicable law.

9. Policy Review and Communication

This Policy will be reviewed periodically to ensure it remains current and effective, particularly in response to changes in legislation or HOPL's business environment.

All updates will be communicated to employees and accompanied by appropriate training. Compliance with updated policies is mandatory from the date of notification.

10. Internal Controls

HOPL's Internal Audit Department maintains robust internal controls and monitoring mechanisms, including audit procedures and whistleblower processes, to prevent, detect, and address any corrupt practices.

This policy forms part of HOPL's commitment to ethical conduct and responsible business. All personnel are expected to read, understand, and comply with its provisions.



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Craig Gibsone
General Manager