

Madulsima Plantations PLC Statement on Anti-Bribery and Corruption

Introduction

The role of the Board of Directors (“Board”) is to provide entrepreneurial leadership of Madulsima Plantations PLC (“Company”). The Board is committed to promoting a corporate culture that prioritizes ethical business practices, transparency, and integrity. In line with this, the Company has adopted a zero-tolerance policy towards any form of bribery or corruption, ensuring compliance with all applicable laws, including the Anti-Corruption Act. This policy applies to all internal and external stakeholders of the Company.

Scope and Application

The Anti-Bribery and Corruption Policy applies to all directors, officers, employees, service providers, customers, suppliers, consultants, and auditors associated with Madulsima Plantations PLC. The policy covers any individual or entity engaged in business dealings with the Company and is applicable to both direct and indirect transactions.

Prohibited Conduct

Madulsima Plantations PLC strictly prohibits offering, soliciting, or accepting bribes in any form. This includes:

- Offering, promising, or authorizing payments to government officials to secure unfair advantages is strictly prohibited.
- Directors and employees must not offer or receive money or anything of value, directly or indirectly, to gain improper advantages in the private sector.
- Prohibited payments include cash, benefits, favors, and certain legitimate business expenditures such as gifts, entertainment, travel, donations, sponsorships, or training.
- Gifts to government officials or private individuals related to the Company’s business requires Board approval and must not contravene laws, including the Anti-Corruption Act.
- The Company ensures donations or sponsorships do not constitute illegal payments to government bodies, officials, private entities, or individuals.
- Facilitating payments are strictly prohibited unless approved by the Board under exceptional circumstances, with all relevant information provided to the legal and compliance officer.
- Using the Company’s property, information, or position for personal gain, either directly or through third-party intermediaries, is prohibited.

Governance and Oversight

The Audit Committee is responsible for reviewing and monitoring the implementation of this policy. The committee ensures ongoing compliance with regulations and ethical standards and provides recommendations for any necessary revisions to the Board of Directors.

Books and Records

All financial records related to the Company’s business must accurately reflect transactions and be maintained in accordance with applicable laws and accounting standards.

Stakeholder Responsibilities

All stakeholders, including employees, directors, customers, suppliers, consultants, and other parties, are required to uphold the highest standards of business integrity when dealing with or on behalf of Madulsima Plantations PLC. Due diligence processes are in place to verify that all external engagements comply with the Company’s ethical standards.

Making a Disclosure

The Company expects both employees and all other stakeholders to report any suspected bribery or corruption involving individuals associated with its operations, including directors, officers, and business partners. Reports should be made in accordance with the procedures outlined in the Company's Whistleblowing Policy, ensuring that those who come forward in good faith are protected from any form of retaliation. All reports will be thoroughly reviewed, and investigations will be conducted promptly and diligently, following the specific guidelines set forth in the policy to maintain transparency and accountability.