

BLACKRAW COMMODITIES
Empowering Global Trade

Anti-Bribery & Anti-Corruption Policy

LAST REVISED

February 2025

1. Introduction

BLACKRAW Commodities Limited ("the Company") is committed to conducting its business with the highest standards of integrity and professionalism. The Company adheres strictly to anti-corruption laws and regulations, including but not limited to the UK Bribery Act 2010, the US Foreign Corrupt Practices Act (FCPA), and relevant anti-bribery laws in other jurisdictions where it operates. This Anti-Corruption Policy outlines the Company's zero-tolerance approach to bribery and corruption in all forms and applies to all employees, officers, directors, agents, representatives, contractors, and affiliates of the Company.

2. Policy Objectives

The objectives of this policy are to:

- Prevent any form of corruption or bribery within the Company's operations.
- Uphold the principles of fair business practices in all dealings with employees, customers, suppliers, and other third parties.
- Ensure that all business operations comply with international anti-corruption regulations and standards.
- Establish a clear process for reporting suspected bribery or corruption incidents.

3. Prohibited Conduct

The Company prohibits the offering, giving, receiving, or soliciting of any form of bribe, kickback, or other corrupt payment, directly or indirectly, to or from any person, organization, or governmental authority. This includes, but is not limited to:

- Bribes, kickbacks, or improper inducements to any individual or entity in exchange for business, services, or regulatory decisions.
- Gifts, hospitality, or other benefits that might influence business decisions inappropriately or create conflicts of interest.
- Facilitation payments to expedite or secure routine government actions (e.g., permits, licenses, or customs clearance).

4. Business Conduct

The Company expects all employees and associated persons to conduct their business relationships and activities with the highest level of integrity:

- **Gifts and Entertainment:** Employees may only offer or accept gifts and entertainment that are modest, appropriate, and in accordance with local laws. Such gifts must not influence business decisions or give the appearance of impropriety.
- **Third-Party Due Diligence:** The Company will conduct thorough due diligence on third-party agents, representatives, and intermediaries to ensure they adhere to anti-corruption standards. Contracts with third parties should include anti-bribery provisions.

- **Charitable Contributions and Sponsorships:** The Company supports legitimate charitable activities but prohibits any charitable donations or sponsorships that are used as a guise for bribery or to influence business decisions.

5. Reporting and Monitoring

Employees and other stakeholders are encouraged to report any concerns or violations of this policy promptly. Reports may be made anonymously, and the Company ensures that all complaints will be treated confidentially, fairly, and without fear of retaliation. Reporting channels include:

- Direct Supervisor
- Human Resources Department
- Compliance Officer
- Whistleblowing Hotline (if applicable)

The Company will investigate all allegations of corruption or bribery and take appropriate action, which may include disciplinary measures, reporting to law enforcement authorities, or termination of contracts.

6. Training and Awareness

The Company will provide regular anti-corruption training to its employees and key stakeholders, including management, to ensure awareness and understanding of the anti-corruption laws and the Company's policy. All employees must complete anti-corruption training during their induction and participate in periodic refresher courses.

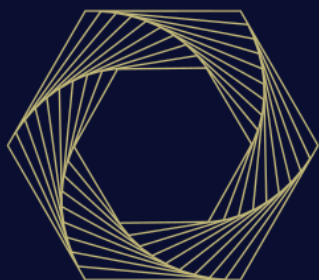
7. Responsibilities

- **Management:** Senior management is responsible for the effective implementation of this policy and ensuring that appropriate resources are allocated for training, reporting, and monitoring.
- **Employees:** All employees must familiarize themselves with this policy and comply with its provisions. Employees must report any actual or suspected breaches of this policy.
- **Compliance Officer:** The Compliance Officer is responsible for overseeing the enforcement of this policy, maintaining records of training, monitoring compliance, and conducting periodic reviews of anti-corruption measures.

8. Consequences of Violations

Violations of this policy may result in disciplinary action, including termination of employment or contract, legal proceedings, and financial penalties. The Company will also cooperate fully with law enforcement authorities and regulatory bodies in the event of an investigation.

For questions regarding this Code or its application, please contact the Legal and Compliance Department at: compliance@blackraw.com.hk Or legal@blackraw.com.hk



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