

## **Anti-Bribery Policy**

Parablu conducts its business professionally, with integrity, and in compliance with the laws of those jurisdictions in which it operates. Our character for acting fairly is built on our company's as well as the values of our employees. It is a part of our commitment to ensure ethical business practices and non-tolerance for any acts of bribery or corruption.

We understand that different countries have laws that prohibit bribery and corruption. Parablu's Anti-Bribery Policy is not intended to supersede any such local laws/regulations. It is intended to ensure that Parablu's employees, and those acting on our company's behalf, behave in a manner that is consistent with the anti-bribery and corruption laws in all countries with which Parablu does business with.

The Policy applies to all Parablu employees (permanent/temporary), contractors, officers, and directors, subsidiaries, and joint venture companies under Parablu's control. The third parties serving on behalf of or in the name of Parablu, including agents, representatives, and other intermediaries, are also required to act consistently with Parablu's Anti-Bribery Policy. Those joint venture companies which are not under Parablu's control, and our joint venture partners, are encouraged to adopt a similar policy and procedures to prevent bribery.

Parablu operates with a zero-tolerance approach to bribery and corruption concerning bribes such as:

- payment, offer, or promise to pay or provide anything of value
- gifts and hospitality
- facilitation payments or fees to speed up or facilitate the performance of routine action to which an entitlement already exists
- payments to government officials

Any third parties engaged to represent Parablu's interests must comply with the principles set out in the Anti-Bribery Policy.

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## **PARABLU**

Parablu's policy does not allow any political donations. We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

Parablu's policy does allow charitable support and donations and encouraged, whether of in-kind services, knowledge, time, or direct financial contributions. However, we encourage all our employees to ensure that charitable contributions are not used as a scheme to conceal bribery and are legal and ethical under local laws and practices. All charitable contributions also are publicly disclosed.

Parablu's Anti-Malpractice Policy encourages employees and others working for the Company to support tackling fraud, corruption, and other malpractice occurrences within the organization and help in setting standards of ethical conduct.

The Policy also guides our business relationships and provides a baseline for our ongoing review of ethical work standards:

- Applying the guidelines directly with our employees and in businesses in which Parablu has a controlling interest and/or has contractually mandated control over standards of operations
- Seeking, in businesses in which Parablu does not have control, to influence significant business partners and suppliers to adopt similar principles
- Make third parties like contractors, agents or consultants, aware of Parablu's Policy and include compliance as a consideration in our decision to award contracts

Parablu constantly monitors the effectiveness and reviews the implementation of its Anti-Bribery and Corruption Policy and regularly suitability, adequacy, and effectiveness. We also encourage employees and others working for the Company to support tackling fraud, corruption, and other malpractice occurrences within the organization and help in setting standards of ethical conduct.

If you have questions and feedback about our Anti-Bribery and Corruption Policy, feel free to write to us at <u>info@parablu.com</u>.