

Integrity and Ethics Policy

APRIL Group is committed to sustainable development and upholds our business philosophy of doing what is “Good for the Country, Good for the Community, Good for the Climate, Good for the Customer, and Good for the Company”.

APRIL recognizes its corporate responsibility to uphold integrity in its business conduct. We comply with RGE’s Code of Conduct and Code of Procurement Ethics which prescribes a zero tolerance approach to non-compliance with the policy across all Business Groups in RGE and Business Partners.

As a signatory to the UN Global Compact, APRIL is committed to its Principle 10 that states “Businesses should work against corruption in all its forms, including extortion and bribery”.

This policy sets out APRIL’s approach to unacceptable business practices, including bribery and corruption. It requires compliance with all applicable laws and regulations on bribery and corruption in countries where APRIL operates, including the relevant guidelines set out in the United Nations Convention Against Corruption.

All APRIL employees and any person who performs services and/or acts for and on behalf of APRIL, including contractors, suppliers, consultants, agency staff and business partners (“persons associated with APRIL”) are required to adhere to this policy, irrespective of the jurisdiction they operate in and the laws applicable to such jurisdiction (where this policy represents a higher standard). Non-compliance may result in disciplinary action, including termination of employment and/or the termination of a third party contract (as the case may be). We will endeavor to make third parties aware of the significance to APRIL of this policy and will encourage them to apply the same policy or a similar standard.

This policy refers to all kinds of corrupt practices and key areas of risk that are likely to arise, including but not limited to:

- Active bribery – the giving, promising or offering of a bribe;
- Passive bribery – the requesting, agreeing to receive or accepting of a bribe;
- Facilitation or Grease Payments - a payment to government employees to speed up an administrative process whose outcome is already determined ;
- Illicit enrichment – misuse of company assets, funds or personnel for any unlawful, improper, or unethical purpose;
- Facilitation of tax evasion – deliberately and dishonestly taking action to facilitate tax evasion;
- Conflicts of interest - deriving personal benefit from actions or decisions made in an official capacity;
- Gifts and hospitality – the offering, giving, receiving of gifts and hospitality that could affect or appear to affect the ability to make objective business decisions;
- Political donations—making political donations on behalf of APRIL or could be misconstrued as being made on behalf of the company; and
- Interactions with Public and Government Officials and lobbying – making business payments with the intent to improperly influence a government official.

Our Company embraces our corporate responsibility to conduct business ethically and with the utmost integrity, transparency and honesty across our operations and commit to:

- Improve our processes continuously to prevent direct or indirect bribery, in order to safeguard and uphold our values.
- Adhere to the anti-bribery and anti-corruption laws and regulations in the countries where we have business activities and undertake ourselves to not engage in any corrupt or improper practices.
- Encourage our business partners and suppliers to share our zero- tolerance policy against corruption and bribery.
- Avoid engaging in business dealings with those known or reasonably suspected to be engaging in corruption and bribery.
- Reject any form of bribery or corruption in our business and will neither give nor accept bribes nor permit others acting on our behalf to do so.
- Uphold ethical and professional business practices at all times.
- Avoid using our position for personal gain.
- Regularly discuss the importance of ethically and legally sound business practices with our employees, contractors, suppliers, consultants, agency staff and business partners.
- Adopt a zero tolerance for retaliation against anyone who raises concerns about a breach of the Code or participates in an investigation.
- Avoid the payment of any facilitation or "Grease Payments".

As set out in the RGE Code of Conduct, employees will not, on behalf of a APRIL, make use of corporate resources, including funds, goods, property, and/or services, for the purpose of contributing to: a political party; a campaign for elected office; a nomination process for a political party; a local political constituency; and/or any individual seeking election at any level of government in any jurisdiction.

Employees may not:

- offer or give or promise anything of value to a government official with the intent to obtain or retain any business or any other advantage;
- pay for any business entertainment, travel expenses or give any gifts to government officials unless these follow the Company's Gift/Entertainment Guidelines, or receive prior approval to confirm legitimacy and reasonableness of the expenses;
- make any payments to government officials, including low-level government employees, to expedite or secure performance of a routine governmental action (sometimes referred to as "facilitation payments").

Employees must:

- make accurate and complete entries in APRIL books and records and follow APRIL's accounting procedures and internal controls;
- have a written agreement with consultants, agents and intermediaries which contains language confirming such party's binding agreement to comply with the APRIL Anti-Corruption Policy.

All personnel are to receive training on this policy at induction and are encouraged to raise any genuine concern about a suspected breach of this policy. Personnel in senior positions or those responsible for conducting due diligence assessments of potential business partners will receive further training on this policy with periodic updates. Where appropriate, training will also be provided to certain business partners.

Reporting violations

All personnel are encouraged to raise any genuine concern about suspected misconduct or malpractice, including bribery, facilitation payments, extortion and money laundering, tax evasion, and ethical misconduct. Known breaches of this policy must be reported through available channels such as Whistleblowing or Grievance Mechanism.

Sanctions

There will be zero tolerance for any cases of violations of this policy. Should any instances of bribery, corruption or other misconduct under this policy be identified, appropriate steps will be taken immediately, including a review and revision of the business relationship, third-party contracts, legal claims and/or appropriate disciplinary action which could lead to termination of employment. Disciplinary action may also be instigated for instances of a failure to report a known violation of this policy.

Monitoring and review

This policy will be enforced through regular monitoring and review and will form part of the Group Internal Audit procedures to periodically assess the its effectiveness. Progress on our commitments to ethical conduct and prohibition of corruption will be reported in our Sustainability Report.

A handwritten signature in black ink, appearing to read "Wang Bo".

Wang Bo
President APRIL Group

February 2023