WASCO ISOAF S.R.L AND ITS SUBSIDIARIES (“ISOAF GROUP”)

ANTI-BRIBERY AND CORRUPTION POLICY

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1. INTRODUCTION

This Anti-Bribery and Corruption Policy (hereinafter referred to as "**ABC Policy**") has been developed as part of WASCO ISOAF S.r.L's and its subsidiaries' (hereinafter referred to as "**ISOAF Group**") ABMS, which has been designed to align with the requirements set out in the **ISO 37001:2016**.

Having a clear and unambiguous ABC Policy statement on ISOAF Group's position regarding Bribery and Corruption forms the cornerstone of an effective ABMS. This ABC Policy elaborates upon those principles, providing guidance to Personnel concerning how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise in the business affairs.

ISOAF Group's Personnel's compliance with and support for this ABC Policy is vital to ISOAF Group's continued success. Failure of compliance to this ABC Policy may have severe consequence to ISOAF Group and may result in disciplinary action against the Personnel.

2. ANTI-BRIBERY AND CORRUPTION COMMITMENT

ISOAF Group is committed to conducting business dealings with ethics and integrity. This means avoiding practices of Bribery and Corruption of all forms in ISOAF Group's daily operations.

ISOAF Group has adopted a zero-tolerance approach against all forms of Bribery and Corruption and takes a strong stance against such acts. ISOAF Group's Personnel will NOT suffer discrimination or disciplinary action for refusing to participate in any activity which is reasonably judged there to be involved Bribery and Corruption but NOT mitigated by ISOAF Group.

3. OBJECTIVE

This ABC Policy sets out ISOAF Group's overall position on Bribery and Corruption in all its forms.

4. SCOPE

This ABC Policy applies to:

a. All ISOAF Group's Personnel

- This ABC Policy applies to ISOAF Group's Directors, top management and its Personnel, regardless of their roles or positions.

- All Personnel must comply with this ABC Policy, procedures and all applicable laws during employment with ISOAF Group.
- Heads of Group Divisions are responsible to communicate with subordinates and ensure their compliance to this ABC Policy within their respective business functions / units**.**

b. ISOAF Group's Business Associates

- This ABC Policy applies to ISOAF Group's Business Associates.
- Heads of Group Divisions are responsible to communicate this ABC Policy to their Business Associates.

c. Controlled Organisations

- This ABC Policy applies to ISOAF Group's Controlled Organisations.
- Heads of Group Divisions are responsible to communicate this ABC Policy to the Controlled Organisations.

d. All parties engaging with ISOAF Group

- This ABC Policy applies to all parties that are currently engaged with ISOAF Group or have intentions to engage with ISOAF Group in the future.
- ISOAF Group will use its influence in good faith to require parties to understand and implement policies and procedures similar to that of ISOAF Group.

5. DEFINITIONS

The following definitions are included in this ABC Policy:

Term	Definition
ABMS	Anti-Bribery & Corruption Management System
ABC Policy	ISOAF Group's Anti-bribery and Corruption Policy
Bribery	Bribery is defined as any action, which would be considered as an offence of giving or receiving 'gratification'. In practice, this means offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person a position of trust within an organisation. 'Gratification' is defined to mean the following: *(a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar*

Term	Definition
	advantage; *(b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;* *(c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;* *(d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;* *(e) any forbearance to demand any money or money's worth or valuable thing;* *(f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and* *(g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).* Bribery may be 'outbound', where someone acting on behalf of the group attempts to influence the actions of someone external, such as a Government official or client decision-maker. It may also be 'inbound', where an external party is attempting to influence someone within the group such as a decision-maker or someone with access to confidential information. Bribery and Corruption are closely related. However, Corruption has a wider remit. See 'Corruption' definition below.
Business Associate	An external party with whom the organization has, or plans to establish, some form of business relationship. This primarily include i.e. clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors (ISO 37001 definition).

Term	Definition
Corruption	The Transparency International definition of corruption is ‘the abuse of entrusted power for personal gain’. For the purpose of this manual, corruption is defined primarily as any action, which would be considered as an offence of giving or receiving ‘gratification’ (‘Bribery’ as defined above). In addition, corruption may also include acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.
Corporate Gift	Something given from one organisation to another, with the appointed representatives of each organisation giving and accepting the gift. Corporate gifts may also be promotional items given out equally to the general public at events, trade shows and exhibitions as a part of building the company’s brand. The gifts are given transparently and openly, with the implicit or explicit approval of all parties involved. Corporate gifts normally bear the company name and logo and are of nominal value. Examples of corporate gifts include items such as diaries, table calendars, pens, notepads, plaques, and festive gifts such as hampers, oranges and dates.
Donation	Charitable contributions made to support the community.
Directors	Directors include all independent and non-independent directors, executive and non-executive directors of the group and shall also include alternate or substitute directors.
Exposed Position	Exposed positions are positions delegated with limits of authorities (LOA) for approving budgets, appointment, procurement, expenditure and payments, and having interface with third parties such as business associates and public officials, and position identified as vulnerable to Bribery through a risk assessment. Such positions may include but is not limited to any role involving procurement or contract management; financial approvals; human resource; relations with government officials or government departments; sales; positions where negotiation with an external party is required; or other positions which the company has identified as vulnerable to Bribery.
Personnel	Directors and all individuals directly contracted to the company on an employment basis, including permanent and temporary employees.

Term	Definition
Conflicts of Interest	Situation where business, financial, family, political or personal interests could interfere with the judgment of persons in carrying out their duties for the organization.
Controlled Organisation	An entity where ISOAF Group has the management control over the organisation and has the right to appoint Directors and this is normally applicable if possessing >50% of the share ownership, but it could be where there is an agreement that ISOAF Group has the right to control the board

6. ANTI-BRIBERY AND CORRUPTION POLICY

6.1 Bribery and Corruption in all its forms as it relates to ISOAF Group's activities is prohibited.

6.2 Bribery and Corruption may take the form of anything of value, such as money, goods, services, property, privilege, employment position or preferential treatment. ISOAF Group's Personnel and its Business Associates shall not therefore, whether directly or indirectly, offer, give, receive or solicit any item of value, in the attempt to illicitly influence the decisions or actions of a person in a position of trust within an organisation, either for the intended benefit of ISOAF Group or the persons involved in the transaction.

6.3 This ABC Policy applies equally to its business dealings with commercial ("private sector") and Government ("public sector") entities, and includes their Directors, Personnel, agents and other appointed representatives. Even the possible appearance of Bribery or Corruption is to be avoided, in particular when dealing with Government officials.

6.4 This ABC Policy applies to all countries worldwide, without exception and without regard to regional customs, local practices or competitive conditions.

6.5 No employee or external party will suffer demotion, penalty or other adverse consequences in retaliation for refusing to engage in Bribery even if such refusal can result in ISOAF Group losing business (except where the individual participated in the violation).

7. RECOGNITION OF LOCAL AND INTERNATIONAL LEGISLATION

7.1 ISOAF Group is committed to conducting its business in ethical manner and compliance with all applicable laws and regulations in the countries where it operates.

7.2 These laws include but are not limited to the Italian Criminal Code, Section 2635 of the Italian Civil Code, the Italian Legislative Decree 231/2001, U.S. Foreign Corrupt Practices Act, U.K. Bribery Act 2010 and all relevant anti-bribery, anti-corruption, anti-money laundering and counter terrorism financing. These laws prohibit Bribery and acts of Corruption, and mandate that companies establish and maintain accurate books and records and sufficient internal controls.

7.3 In cases where there is a conflict between mandatory laws and the principles contained in this ABC Policy, the mandatory laws shall prevail.

8. GIFTS, HOSPITALITY & ENTERTAINMENT

8.1 ISOAF Group's Personnel are prohibited from soliciting or asking for gifts, hospitality and entertainment from Business Associates or other parties engaged in business with ISOAF Group.

8.2 Under no circumstances may ISOAF Group's Personnel or their family members accept gifts in the form of cash, food hampers, gift certificates, loan repayment, commissions, coupons, discounts or any other related forms.

8.3 In situations where it is NOT possible to refuse or return a gift, or the refusal is likely to cause serious offence, ISOAF Group's Personnel shall report to the line manager, Heads of Group Divisions and the board of directors of ISOAF Group for decision to the treatment of the gift received.

8.4 The only form of allowable gifts giving to Business Associates and other parties engaged with ISOAF Group is Corporate Gifts, which is worth less than USD 100 per item or its local currency equivalent, given at a company-to-company level, as a token of appreciation at an official function or public event, do NOT improperly influence a business outcome, and be perceived as Bribery. Corporate Gifts must NOT be provided to the same recipient at more than 3 times a year.

8.5 ISOAF Group's Personnel may accept hospitality of Business Associates and paying for light meals, coffee, tea, soft drinks, biscuits and sandwiches during a meeting.

8.6 Hospitality should NOT be accepted frequently from the same party, or during specific time periods, such as tender or contract negotiations. In any event, hospitality must NOT be received from the same party at more than 3 times a year.

8.7 Certain ISOAF Group's Personnel are allowed to offer meals to Business Associates and other parties engaged with ISOAF Group provided they fall within the following limited exceptions:

8.7.1 It is business-related (i.e. only for those directly connected to the operations of ISOAF Group).

8.7.2 It is not for spouses and other non-business guests.

8.7.3 The cost of the meal does NOT exceed the thresholds stipulated by the board of directors of ISOAF Group.

8.8 ISOAF Group's Personnel may participate in normal and non-frequent business entertainment with Business Associates such as sporting events, with the purpose of fostering better business relations, provided the cost in association of such entertainment is paid or shared by ISOAF Group.

9. CHARITABLE DONATIONS, SPONSORSHIPS & CORPORATE SOCIAL RESPONSIBILITIES

9.1 ISOAF Group is committed to charitable donations, sponsorships and corporate social responsibilities (CSR) for the well-being of the society and community.

9.2 It is however important that all charitable donations, sponsorships and CSR are made in accordance with ISOAF Group's policies, permitted by the laws and regulations, given without the intention of influencing someone to act improperly or as a reward for having acted improperly.

9.3 All requests of recipient organizations for charitable donations, sponsorships and CSR must be scrutinized by the board of directors of ISOAF Group to ensure that it fits within ISOAF

Group's established criteria.

9.4 It is ISOAF Group' policy to prohibit its Personnel from requesting vendors for charitable donations, sponsorships and CSR to individual, their friends or relatives.

10. POLITICAL CONTRIBUTIONS

10.1 ISOAF Group may offer monetary or in-kind political contributions to political parties, politicians or candidates for parliamentary or state seats in election provided that such provision are within the limits permissible by the laws and regulations, without the intention of influencing someone to act improperly or as a reward for having acted improperly.

10.2 Political contributions should NOT be frequently provided to the same recipient politician and political parties.

10.3 All requests from recipient political parties and politicians for political contributions must be scrutinized by the board of directors of ISOAF Group to ensure that it fits within the group's established criteria.

10.4 ISOAF Group's Personnel are encouraged to participate in the political election process by voting. Such Personnel may choose to make personal political contributions as appropriate within the limits established by law. Nevertheless, such personal political contributions will NOT be reimbursed by ISOAF Group.

10.5 ISOAF Group's Personnel, without the board of directors of ISOAF Group's approval, are prohibited from using their positions within ISOAF Group to influence any Business Associates in making political contributions or giving support to politicians and parties, use of ISOAF Group's resources, venues, facilities, and equipment to benefit political campaign, political party or politician.

11. MONEY LAUNDERING

11.1 ISOAF Group prohibits practices related to money laundering, including dealing in the proceeds of criminal activities.

11.2 Money laundering involves the placement of illegally obtained money into legitimate financial systems in order that monetary proceeds derived from criminal activities are transformed into funds with an apparently legitimate sources, or when legitimate funds are used to support criminal activities, including financing terrorism.

11.3 To avoid violating anti-money laundering laws, ISOAF Group's Personnel are expected to always conduct due diligence on planned and ongoing relationship with Business Associates and third parties, to understand their business background, the origin and destination of fund and payments.

11.4 ISOAF Group's Personnel shall report any irregularities of fund source and suspicion of transactions in aiding illegal or terrorist activities, to their line manager, Heads of Group Divisions and the board of directors of ISOAF Group for further actions.

12. FACILITATION PAYMENTS

12.1 ISOAF Group adopts a strict policy of disallowing the use of facilitation payments in its business. Facilitation payment is a payment or other provision made personally to an individual in control of a process or decision. It is given to secure or expedite the performance of a routine or administrative duty or function.

12.2 ISOAF Group's Personnel shall decline to make the payment and report to line manager, Heads of Group Divisions and the board of directors of ISOAF Group immediately when they encounter any requests for a facilitation payment. In addition, if a payment has been made and such Personnel is unsure of the nature, the line manager, Heads of Group Divisions and the board of directors of ISOAF Group must be notified immediately, and the payment recorded accordingly.

12.3 Only in the event that an ISOAF Group's Personnel security is at stake is it permitted to make the payment. Such Personnel must immediately report the incident to their Heads of Group Divisions to record the details and keep a record of what was spent.

13. SUPPORT LETTERS

13.1 A "support letter" is a directive or decision from politician, government administration, or highly influential persons, to influence decision and request for special privileges to be given to an individual or organization for project award and application.

13.2 Support letters may also come in other forms, such as text messages, phone calls and e-mails.

13.3 ISOAF Group do NOT use support letters to request for any project award or application.

13.4 Likewise, ISOAF Group prohibit external parties from using support letters to influence ISOAF Group's decision-making in project award or application.

13.5 ISOAF Group do NOT issue support letters for person, their family and friends, and Business Associates.

13.6 In the event any ISOAF Group's Personnel received a request for support letters, such Personnel should NOT promise the requestor for anything, and shall report to their line manager, Heads of Group Divisions and the board of directors of ISOAF Group for further actions.

14. RECRUITMENT, PROMOTION AND SUPPORT OF PERSONNEL

14.1 ISOAF Group value the cultures of ethics and integrity, and directs its attention to the roles of culture in supporting the ABC Policy.

14.2 ISOAF Group's recruitment, training, incentive and appraisal, remuneration, promotion and transfer, and disciplinary processes for its Personnel and top management, are designed and updated regularly to uphold ethics and integrity.

14.3 ISOAF Group encourage and support its Personnel to do the right thing. When recruiting new Personnel, assessment will be given to the ethical attributes of an individual.

14.4 ISOAF Group's Personnel are assessed, incentivized and recognized for good behavior and contributions to the anti-Bribery and Corruption controls.

15. BUSINESS ASSOCIATES & THIRD PARTIES

15.1 All Business Associates acting on behalf of ISOAF Group are required to comply with this ABC

Policy and other relevant policies (as may be implemented by ISOAF Group from time to time).

15.2 All Controlled Organisations are required to implement this ABC Policy. For organizations where ISOAF Group do not have the controlling interest, they are encouraged to comply with this ABC Policy or implement their own anti-Bribery and Corruption controls.

15.3 ISOAF Group avoids dealing with Business Associates known or reasonably suspected for corrupt practices or known or reasonably suspected to pay bribes.

15.4 Due diligence and risk assessment will be conducted on planned and ongoing Business Associates to have confident that they are honest and can be reasonably expected to refrain from Corruption.

15.5 Contractual terms with Business Associates must allow ISOAF Group to terminate/ discontinue the contractual relationships in the event they have been found involved in Bribery and Corruption.

15.6 Periodic review of Business Associates and third-parties risk assessment and due diligence must be carried out to check whether anti-Bribery and Corruption controls are effective for the existing relationships with ISOAF Group to continue.

16. CONFIDENTIALITY OBLIGATIONS

16.1 The business affairs and records of ISOAF Group comprising operations, finance, business planning, investor relations, corporate branding, external communication, sales and marketing, corporate services, strategic business and documents comprising procedures, processes, manufacturing methods, e-mails, letters, reports, specifications, formulae, forms, licenses, agreements or other documents or files are all confidential information belonging to ISOAF Group.

16.2 This information is strictly private and confidential and shall NOT be utilised, discussed with, divulged to or disclosed to persons inside or outside ISOAF Group, except by persons authorised to do so.

16.3 ISOAF Group's Personnel shall NOT, either during or after employment with ISOAF Group, disclose, divulge or utilise without appropriate authorisation any such confidential information.

ISOAF Group's Personnel must, both during and after employment, take all reasonable precautions to keep all such confidential information secret.

17. FINANCIAL INTEGRIY

17.1 ISOAF Group's Personnel must comply with all policies and procedures established to safeguard and support the integrity and accuracy of ISOAF Group' books, records and financial reporting. In this regard, ISOAF Group's Personnel must not:

a) conceal, alter, destroy or otherwise modify ISOAF Group's records or documents;
b) intentionally make a false or misleading entry in a record, report, file or claim (including travel and entertainment expense reports); or
c) fail to cooperate fully and truthfully with internal and external audits authorised by ISOAF Group.

18. RESPONSIBILITIES OF ISOAF GROUP PERSONNEL

18.1 All ISOAF Group's Personnel (including Directors and Personnel of its Controlled Organisations) are required to carry out those responsibilities and obligations relating to ISOAF Group's anti-Bribery and Corruption stance, alongside those already in existence, which includes the following:

a) Be familiar with applicable requirements and directives of the ABC Policy and communicate them to their subordinates;
b) Promptly record all transactions and payments in ISOAF Group's books and records accurately and with reasonable detail;
c) Ask the board of directors of ISOAF Group if any questions about this ABC Policy arise or if there is a lack of clarity about the required action in a particular situation;
d) Always raise suspicious transactions and other "red flags" (indicators of Bribery or Corruption) to immediate superiors for guidance on the next course of action;
e) Be alert to indications or evidence of possible violations of this ABC Policy;
f) Promptly report violations or suspected violations through appropriate channels;
g) Attend required anti-Bribery and Corruption training as required according to position; and
h) Not misuse their position or ISOAF Group's name for personal advantage.

18.2 When dealing with Business Associates, ISOAF Group's Personnel shall not:

a) express unexplained or unjustifiable preference for certain parties;
b) make any attempt at dishonestly influencing their decisions by offering, promising or conferring advantage;
c) exert improper influence to obtain benefits from them;
d) directly or indirectly offer or make promise or corrupt payments, in cash or in kind for a specific favour or improper advantage from them.

18.3 During an active or anticipated procurement or tender exercise, ISOAF Group's Personnel participating in the exercise in any way whatsoever, shall not:

a) receive gifts or hospitality or any kind from any external party participating, planning to participate, or expected to participate, in the procurement or tender exercise;
b) provide anything other than a Corporate Gift and token hospitality to any external/third party related to the exercise;
c) be involved in any discussions regarding business or employment opportunities, for personal benefit or for the benefit of a Business Associate;
d) abuse the decision-making and other delegated powers given by the board of directors of ISOAF Group; and
e) bypass normal procurement or tender process and procedure.

18.4 When dealing with external parties in a position to make a decision for ISOAF Group's benefit (such as a Government official or client), ISOAF Group's Personnel shall not:

a) offer, promise or make any attempt at dishonestly influencing the person's decision by directly or indirectly offer or make promise of corrupt payments, in cash or in kind;
b) be involved in any discussions regarding business or employment opportunities, for their own personal benefit or for the benefit of the external party;
c) otherwise abuse the decision-making and other delegated powers given by the board of directors of ISOAF Group, in order to illicitly secure an outcome which would be to the commercial advantage to themselves and/or to ISOAF Group; and
d) exert improper influence to obtain personal benefits from them.

18.5 ISOAF Group's Heads of Group Divisions are allocated responsibilities to ensure that the ABMS requirements are applied and complied with within their departments or functions. They must ensure their subordinates holding Exposed Positions to attend the relevant ABMS trainings.

19. CONFLICTS OF INTEREST

19.1 Conflicts of Interest situations arise when personal interests interfere with the judgement of persons in carrying out their duties for ISOAF Group.

19.2 To promote an openness and transparency for managing actual, potential, or perceived Conflicts of Interest, ISOAF Group's Personnel shall declare any actual, potential or perceived Conflicts of Interest to his/her line manager and Heads of Group Divisions, to ensure that all decisions made on behalf of ISOAF Group are based on an objective and fair assessment without being impacted by personal interest.

20. ANTI-BRIBERY AND CORRUPTION COMPLIANCE FUNCTION

20.1 The board of directors of ISOAF Group will oversee the design, implementation and management of the ABMS.

20.2 The officer appointed by the board of directors of ISOAF Group (hereinafter referred to as "**Integrity Officer**") shall conduct regular risk assessments to identify the Bribery and Corruption risks potentially affecting ISOAF Group. Integrity Officer shall also review the suitability of this ABC Policy from time to time, taking into account the latest developments in the legislation as well as the evolvement of industry and international standards.

20.3 Integrity Officer shall be an independent authority and empowered to act against misconduct, Bribery and Corruption, including instigating investigations whenever deemed necessary based on reasonable cause for suspicion.

20.4 Integrity Officer shall implement and effectively manage routine anti-Bribery and anti-Corruption measures as deemed appropriate to ring-fence ISOAF Group against possible legislative liabilities, as well as undertake ad-hoc measures deemed necessary based on circumstantial requirements arising during the course of operations.

21. TRAINING AND AWARENESS

21.1 ISOAF Group shall conduct an awareness programme for all its Personnel on ISOAF Group's position regarding anti-Bribery and Corruption, integrity and ethics.

21.2 Training shall be provided on a regular basis, in accordance with the level of Bribery and Corruption risk related to the position. Training should be provided to Personnel who are:

a) new to ISOAF Group;
b) appointed to or currently holding an Exposed Position.

21.3 Human Resources Department shall maintain records to identify which ISOAF Group's Personnel have received training, and produce, communicate and update the training schedule periodically.

21.4 Business Associates acting on behalf of ISOAF Group shall also undergo appropriate training, where a Bribery and Corruption risk assessment identifies them as posing a more than minor Bribery and Corruption risk to ISOAF Group.

22. WHISTLEBLOWING OF POLICY VIOLATIONS

22.1 ISOAF Group's Personnel are encouraged to report any attempted, suspected, and actual misconduct such as Bribery, Corruption, fraud, financial impropriety, gross mismanagement, violation of this ABC Policy, violation of the Vendor Business Conduct Undertaking, or weakness in the ABMS.

22.2 Whistleblower reporting, either anonymously or otherwise in good faith on the basis of a reasonable belief, is assured of confidentiality to the reporter identification and prohibition from retaliation by ISOAF Group regardless of the outcome of any investigation.

22.3 Any concerns of attempted, suspected or actual misconduct and violation should be reported to the following disclosure channels:

Name : Giancarlo Maccagno
Email : giancarlo.maccagno@wascoenergy.com

Telephone	:	+603 26856800
Mail	:	Mark Strictly Confidential Wasco Management Services Sdn. Bhd. Suite 19.01 Level 19, The Garden North Tower, Mid Valley City, Lingkaran Syed Putra, 59200, Kuala Lumpur

22.4 In the case where reporting to management is a concern, then the report should be made to the Chairman of Audit Committee. Channel of reporting to the Chairman of Audit Committee are:

Name	:	Halim Bin Haji Din
Email	:	halim.din@theiagroup.com
Telephone	:	+603 2776 7388
Mail	:	Mark Strictly Confidential Wasco Management Services Sdn. Bhd. Suite 19.01 Level 19, The Garden North Tower, Mid Valley City, Lingkaran Syed Putra, 59200, Kuala Lumpur

22.5 Integrity Officer shall conduct, or appoint an external party to conduct an investigation to the alleged misconduct and violation of this ABC Policy.

22.6 Depending on the outcome of investigation, ISOAF Group may seek remedies for misconduct, Bribery and Corruption, apply disciplinary actions to the Personnel or Business Associate involved, or refer the violation to the enforcement authorities.

- End of the ABC Policy -