

Anti-Bribery & Anti-Corruption Policy

Rules for preventing bribery, kickbacks and improper advantages in Musen business

DOCUMENT MUS-POL-ETH-001

VERSION 1.0

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1. Purpose

Musen Agriculture and Forestry Sole Co., Ltd. is committed to conducting business honestly and to preventing bribery and corruption in its activities. This Policy establishes the minimum rules for personnel and persons acting on Musen's behalf.

2. Scope

This Policy applies to Musen directors, managers, supervisors, employees and seasonal workers. Musen must also apply appropriate anti-bribery expectations to agents, consultants, contractors, transport providers, suppliers and other third parties acting for or representing Musen.

3. Policy statement

Musen prohibits bribery and corruption. No person acting for Musen may directly or indirectly offer, promise, give, request, agree to receive or accept money, gifts, hospitality, favours or any other advantage where the purpose is to improperly influence a decision, obtain or retain business, secure preferential treatment, avoid a legitimate requirement or reward improper conduct.

4. Prohibited conduct

- Cash bribes, kickbacks, secret commissions or similar improper payments.
- Payments or benefits made through another person or organisation when the underlying purpose would be prohibited if done directly.
- Improper payments to public officials or private-sector personnel to influence permits, inspections, contracts, transport, procurement, payments or other decisions.
- Facilitation payments intended to accelerate or secure a routine action to which Musen is already entitled, except where a payment is made under an immediate and credible threat to personal safety; any such event must be reported as soon as safely possible.
- False invoices, fictitious services, inflated charges, undisclosed rebates or other arrangements intended to conceal an improper payment.
- Using charitable contributions, sponsorships, employment opportunities, gifts or hospitality as a disguised means of influencing a decision.

5. Gifts and hospitality

Reasonable and legitimate business hospitality may be acceptable where it is lawful, infrequent, proportionate, transparent and not intended to influence a decision. Cash and cash-equivalent gifts are prohibited. Gifts or hospitality must not be offered or accepted during a tender, procurement, approval, inspection or other sensitive decision where they could reasonably create an improper influence. Detailed approval thresholds and recording requirements will be established in Musen's conflicts, gifts and hospitality controls.

6. Public officials

Interactions with government officials, inspectors, regulators and other public-sector representatives require particular care. Only legitimate, properly documented fees and payments may be made. Where practical, official fees should be paid directly to the relevant authority against an official receipt or other verifiable record.

7. Third parties

Musen must take reasonable steps, proportionate to the risk, before appointing third parties who may interact with clients, authorities or other parties on Musen's behalf. Warning signs such as unexplained commissions, requests for cash, unusual payment routes, refusal to document services or requests to conceal a relationship must be escalated before proceeding.

8. Procurement, invoices and records

Purchases, payments, commissions, reimbursements and other transactions must have a legitimate business purpose and sufficient supporting records. No off-book account or deliberately misleading description may be used to conceal a payment or benefit. Personnel must not approve their own improper or unsupported expenditure.

9. Conflicts of interest

Personal, family or financial relationships that could affect a Musen business decision must be disclosed. A disclosed conflict does not automatically mean wrongdoing, but it must be managed transparently and the affected person may need to step out of the relevant decision.

10. Reporting concerns

Suspected bribery, requests for improper payments, suspicious third-party arrangements or attempts to conceal transactions must be reported promptly to the Managing Director or through Musen's confidential misconduct reporting mechanism. Retaliation against a person who raises a genuine concern in good faith is prohibited.

11. Response to suspected breaches

Musen will review credible concerns and take proportionate action. This may include stopping a transaction, seeking supporting information, removing a person from a decision, corrective or disciplinary action, ending a third-party relationship, or referral to the appropriate authority where required. Relevant records must be preserved.

12. Responsibilities

Role	Responsibility
Managing Director	Approve this Policy, set the expected standard and decide/escalate significant integrity matters.
Managers and supervisors	Apply the Policy in operational and commercial decisions, maintain appropriate records and escalate concerns.
Personnel	Do not engage in prohibited conduct; maintain accurate records; disclose concerns and potential conflicts.
Persons engaging third parties	Apply proportionate checks and ensure relevant anti-bribery expectations are communicated.

13. Related documents

- MUS-COD-ETH-001 - Corporate Code of Conduct.
- Conflicts of Interest, Gifts & Hospitality controls - to be issued.
- Confidential misconduct / whistleblowing reporting procedure - to be issued.