

Anti-Bribery and Corruption Policy

1 Policy Statement

This policy is to ensure that QIMA conducts business in an honest and ethical manner.

In accordance, QIMA takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships, wherever it operates, and implementing and enforcing effective system to counter bribery.

2 Purpose

QIMA will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it conducts business.

3 Scope

This policy applies to all individuals working for or on behalf of QIMA at all levels, whether permanent, fixed-term or temporary regardless of location, including consultants, contractors, agency staff, volunteers, agents, sponsors or any other person who performs services for or on behalf of QIMA.

4 Definitions

For this policy, a third party is defined as any individual or organisation whose employees come into contact with QIMA during the course of work and the running of QIMA's business, and includes actual and potential clients, intermediaries, referrers of work, suppliers, distributors, business contacts, agents, advisers, government and public bodies (including their advisers, representatives and officials), politicians and political parties.

Bribery is defined as offering, giving or promising (or authorizing someone to offer, give, or promise) an improper benefit, directly or indirectly, with the intention of influencing or rewarding the behaviour of someone to obtain or retain a commercial advantage.

A bribe is an inducement or reward offered, promised or provided in order to improperly gain any commercial, contractual, regulatory or personal advantage, which may constitute an offence under the law namely:

- Giving or offering a bribe;
- Receiving or requesting a bribe; or
- Bribing or attempting to bribe a foreign public official.

QIMA may also be liable under the law if it fails to prevent bribery by an associated person (including, but not limited to employees) for QIMA's benefit.

5 Gifts, Hospitality and Expenses

This policy does not prohibit normal and appropriate gifts, hospitality and expenses (given and received) to or from third parties unless otherwise specifically stated.

However, employees shall subject to the principles set out below namely that any gift or hospitality:

- Must not be made with the intention of improperly influencing a Third Party or Worker to obtain or retain business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- Must comply with local law in all relevant countries;
- Must be given in the name of the organisation, not in an individual's name;
- Must not include cash or a cash equivalent;
- Must be appropriate in the circumstances;
- Must be of an appropriate type and value and given at an appropriate time considering the reason for the gift;
- Must be given openly, not secretly; and
- In the case of gifts, they must not be offered to, or accepted from, government officials or representatives, politicians or political parties, without the prior approval of QIMA's Compliance Officer.

It is not acceptable for any employees to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that they or QIMA will improperly be given a business advantage, or as a reward for a business advantage already improperly given;
- Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure;
- Accept payment from a third party where it is known or suspected that it is offered or given with the expectation that the third party will improperly obtain a business advantage;
- Accept a gift or hospitality from a third party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by QIMA in return;
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- Engage in any activity that might lead to a breach of this policy.

6 Facilitation Payments and "Kickbacks"

QIMA does not make and will not accept facilitation payments or "kickbacks" of any kind, such as small, unofficial payments made to secure or expedite a routine government action by a government official, or payments made in return for a business favour or advantage.

HR Team shall not give priority to relatives and friends of stakeholders to get any business benefit and kickbacks.

Admin team shall make an objective assessment to all external suppliers and refuse to accept kickbacks or any facilitation payments from suppliers.

7 Charitable contributions and sponsorship

QIMA only makes charitable donations and provides sponsorship that are legal and ethical under local laws and practices.

8 Political Contributions

QIMA does not provide monetary or non - monetary (e.g., resources, facilities) contributions to support political parties, politicians or political initiatives.

9 New Business and Joint Ventures

Before entering into an agreement for new business or entering into a joint venture, adequate anti-bribery due diligence must be completed. In addition, a remediation plan should be developed and implemented to address identified issues.

10 Record Keeping

QIMA keeps appropriate financial records and has appropriate internal controls in place which evidence the business reason for gifts, hospitality and payments made and received.

All relevant financial controls and approval procedures must be followed.

11 Responsibilities and Raising Concerns

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for QIMA or under QIMA 's control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees are required to notify QIMA as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future, or if they are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

Any employee who breached this policy may face disciplinary action, which could result in dismissal for gross misconduct. QIMA reserves the right to terminate contractual relationships with employees if this policy is breached.

If any employee or third party is aware of any activity by any worker which might lead to, or suggest, a breach of this policy, they should raise their concerns with QIMA's compliance officer Stanislas Teisseire, via:

- Stanislas.teisseire@qima.com;
- compliance@qima.com; or
- Compliance Hotline: +86 01 8639 1441

12 Training and Communication

This policy is provided for all employees via e-learning platform, included in "QIMA Compliance Training" course.

QIMA's zero-tolerance approach to bribery and corruption, where appropriate, is communicated to clients, suppliers, contractors and business partners.

13 Monitoring and Review

QIMA Compliance committee monitors the effectiveness and reviews the implementation of this policy at appropriate intervals, considering its suitability, adequacy and effectiveness. Any improvements identified are made as soon as possible.

14 References

- QIMA Employee Handbook
- QIMA Employee Code of Ethics
- QIMA Travel Expenses Policy

QIMA Compliance Policy