

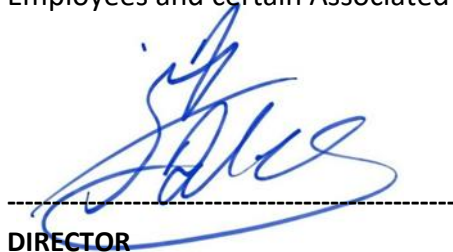
ANTI BRIBERY AND ANTI CORRUPTION POLICY

The Management of NIXAMS INTERNATIONAL LIMITED in its anti-bribery and anticorruption policy shall state as follows that,

- Company Employees and Associated Persons may not, directly or indirectly, (i) offer, (ii) promise, (iii) agree to pay, (iv) authorize payment of, (v) pay, (vi) give, (vii) accept, or (viii) solicit Anything of Value to or from any third party in order to secure or reward an improper benefit or improper performance of a function or activity.
- Anything of Value” means bribes, kickbacks, a financial advantage, or any other benefit, whether in cash or in kind, tangible or intangible. Examples include gifts, meals, entertainment, airline tickets or discounts, travel vouchers, offers of employment or charitable contributions. Prohibited payments can also include so-called “facilitating payments,” which are routine payments typically made to low-level Government Officials to expedite or secure a service or routine action.
- Prohibited payments or offers are impermissible at all times, whether or not they are given to a Government Official or an employee of a nongovernmental business or entity, and regardless of whether they are given by another person or entity on behalf of the Company.
- Government Official” includes any elected or appointed official of a national or local governmental entity of any country; representatives or employees of a government agency at any level, including customs, immigration and transportation workers; military personnel; representatives of political parties.
- Company Employees, contractors and Associated Persons should avoid any conduct that creates even the appearance of improper activity or conduct.

Violations of this policy can have severe consequences on the Company Employees, contractor, or Associated Persons, including criminal and civil penalties. Any Company Employee, contractor or Associated Person found to have engaged in prohibited conduct or ignored suspicious activity may face discipline, including termination of employment or contract and/or referral to appropriate law enforcement authorities. Company

Employees and certain Associated Persons will receive training to guide their compliance.



DIRECTOR

NIXAMS INTERNATIONAL LIMITED
JANUARY 2025

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