

---

## **Yihai Kerry Arawana Holdings Co., Ltd.**

### **Anti-corruption Policy**

Yihai Kerry Arawana Holdings Co., Ltd. (hereinafter referred to as the “Company”) commits to engaging in anti-corruption in accordance with relevant national laws, regulations and rules. For safeguarding the integrity atmosphere of the Company and preventing and controlling corruption risks, the Company hereby formulates this Policy in accordance with relevant laws and regulations, Articles of Association and other relevant documents based on the actual situation.

#### **1. Scope of Application**

This Policy is a disclosure statement applicable to all employees of the Company and its subsidiaries, as well as to all external parties that have business relationships with the Company, including customers, suppliers, contractors and other stakeholders (hereinafter referred to as “partners”).

#### **2. Definition**

Corruption refers to any behavior that damages the interests of the Group by various means in violation of national laws and regulations or the Group systems or deviating from the Group values in order to seek personal interests, including but not limited to accepting bribes, abusing power, engaging in malpractice for favoritism and embezzling or misappropriating the Company's property.

#### **3. Anti-corruption Regulations for Employees of the Company**

Employees of the Company shall be honest and self-disciplined, and shall not take advantage of their position to ask for, directly or implicitly, or accept bribes or obtain other property or non-property benefits, including but not limited to privately accepting payment for goods and other payments that should have been paid into the Company's corporate account. Employees are not allowed to use their authority or influence to obtain special benefits for specific partners (including borrowing money, arranging relatives, accepting labor services and technical services, offering preferential conditions and obtaining trading opportunities).

Employees shall strictly abide by the rules of fair competition and shall not offer bribes to others for seeking improper benefits.

Refer to the internal management system of the Company - Code of Conduct for Employees for specific requirements.

#### **4. Anti-corruption Regulations for Partners of the Company**

Partners are not allowed to offer commercial bribes to the employees of the Company in any name or in any form, such as providing money, presenting gifts, high-priced dining and entertainment activities and other activities that provide personal interests or benefits. Refer to the Anti-Commercial Bribery Agreement and the internal management system of the Company - Code of Conduct for Employees for specific requirements.

#### **5. Anti-corruption Training**

The Company conducts training on this Policy and related systems through new employee training, supplier training and other training, so that employees and partners can know this Policy and related systems.

#### **6. Inspection of the Implementation of This Policy**

The Internal Audit Department of the Company mainly focuses on and inspects non-conformance with this Policy in the annual audits and/or special audits of the Company and its subsidiaries in the places of operation. The inspection results shall be reported to the Company's executive body and relevant committees of the Board of Directors in a timely manner.

#### **7. Rewards and Punishments**

The Company shall hold employees accountable for proven corruption, and give corresponding punishment according to relevant provisions, or transfer the employee to judicial authority for holding legally accountable in serious cases. Refer to the internal management system of the Company - Code of Conduct for Employees for specific requirements.

The Company will initiate corresponding punishment measures under the Anti-Commercial Bribery Agreement for partners violating the Anti-Commercial Bribery Agreement or this Policy. Those suspected of any crime shall be transferred to the judicial authority for holding criminally liable.

#### **8. Complaints and Whistleblowing**

---

Any employee or partner of the Company who discovers (or has reasonable grounds to suspect) any improper or illegal behavior in the scope of work shall raise the concern to the Company as soon as possible, or directly complain to the Chairman of the Company (kkh@wilmar.com.sg). Whistleblowers would be protected, for details, referring to the Whistleblower Protection Policy.

## **9. Policy Review**

The Company regularly reviews and updates this Policy in accordance with laws and regulations, its own business development, industry common practices and good standards.

Kuok Khoon Hong  
Chairman, Sustainability Committee  
Yihai Kerry Arawana Holdings Co., Ltd.  
December 1, 2021