



ANTI CORRUPTION COMPLIANCE POLICY

1. PURPOSE

Tri-Star Industries (TSI) is firmly committed to upholding the highest standards of integrity and accountability. We adopt a zero-tolerance stance against bribery and corruption in all our business dealings and operations.

This policy aims to:

- Prevent and detect corruption and bribery.
- Ensure compliance with all applicable laws, including the Prevention of Corruption Act (Chapter 241, Singapore) and relevant international anti-bribery and anti-corruption laws where TSI operates.
- Promote a culture of ethical conduct and legal compliance across the organisation.

2. SCOPE

This policy applies to:

- All employees, directors, officers, and contracted third-party representatives of TSI, in every country where TSI operates.
- Joint venture partners, consultants, agents, distributors, and subcontractors, where appropriate.

Any violation of this policy may result in:

- Disciplinary action, including termination of employment or engagement.
- Referral to legal or regulatory authorities for further investigation or prosecution.

Supervisors and managers are responsible for ensuring their teams understand and comply with this policy.

Additionally, TSI reserves the right to reconsider its business relationships with any third party that does not demonstrate the same commitment to anti-corruption principles.

3. POLICY STATEMENT

TSI has implemented internal procedures, controls, and expectations to support our anti-corruption objectives, including:



TRI-STAR INDUSTRIES PTE LTD

Business Registration No.: 197903453H

36 Joo Koon Road, Singapore 628988

Tel: (65) 6266 3636

Fax: (65) 6265 3635

website: www.tristar.com.sg

Email: sales@tristar.com.sg

3.1 Prohibited Practices

3.1.1 Bribery and Facilitation Payments

- Strictly prohibited from offering, giving, requesting, or accepting bribes, kickbacks, or facilitation payments—regardless of local customs or practices.

3.1.2 Political and Charitable Contributions

- Prohibited from making any donations or contributions—whether political, charitable, or social—that are intended to obtain an improper advantage or to influence a business decision.

3.1.3 Gifts and Entertainment

- Offering or receiving gifts, meals, travel, or entertainment is prohibited if it is not transparent, proportionate, or in line with TSI's policies and cannot reasonably be seen as a bribe.
- Refer directly to the Gifts and Sponsorship Acceptance Policy for thresholds and approval procedures.
- Particular care must be taken with gifts or entertainment involving public officials.

3.2 Internal Controls and Recordkeeping

3.2.1 Transparency and Documentation

- All payments, including hospitality, gifts, and donations, must be properly approved, recorded, and retained in accordance with TSI's finance and compliance policies.
- Documentation must be kept for a minimum of five (5) years.

3.2.2 Dealings with Government Officials

- Explicit prior written approval from senior management is required for any expenditure involving government officials.
- Enhanced documentation and transparency standards apply to these transactions.

3.3 Due Diligence on Third Parties

- Due diligence must be conducted before entering into any agreement with agents, consultants, or representatives.
- Contracts must contain explicit anti-corruption clauses, including the right to terminate for breach.



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3.4 Training and Awareness

- Employees shall receive periodic training to understand their responsibilities, identify red flags, and report suspicious activities.
- Compliance with this policy is part of TSI's mandatory onboarding and continuing education.

4. ADMINISTRATION AND REVIEW

This policy is managed by the Compliance Officer and will be reviewed annually or as required to reflect changes in law or company operations.

Updates will be communicated to all relevant stakeholders promptly.

PERRY LIM

CHIEF EXECUTIVE OFFICER