

1. Purpose

This Fair Trade Policy establishes the Company's commitment to conducting business in a lawful, ethical, transparent, and responsible manner in all commercial activities. The Company recognizes that fair trade practices are fundamental to maintaining market integrity, protecting stakeholder trust, ensuring compliance with applicable trade and competition laws, and supporting sustainable supply chains.

The purpose of this policy is to prevent unfair competition, corruption, exploitation, deceptive practices, anti-competitive behavior, and violations of trade regulations while promoting integrity and accountability throughout the Company's operations and value chain.

2. Scope

This policy applies to:

- All employees, directors, and officers
- Suppliers, contractors, and agents
- Distributors and intermediaries
- Consultants and representatives
- Joint venture partners and business affiliates

It covers all domestic and international business transactions, procurement activities, sales operations, marketing practices, and supply chain engagements.

3. Compliance with Trade and Competition Laws

The Company shall comply with all applicable national and international trade, competition, and anti-trust laws. The Company strictly prohibits:

- Price fixing agreements
- Market allocation arrangements
- Bid rigging
- Collusive practices
- Abuse of dominant market position
- Unlawful exchange of competitively sensitive information

Employees shall not engage in discussions or agreements with competitors that may restrict competition or violate anti-trust regulations.

Where uncertainty exists regarding trade law compliance, legal consultation shall be sought prior to action.

4. Anti-Bribery and Anti-Corruption Commitment

The Company maintains a zero-tolerance approach toward bribery and corruption. No employee or representative shall offer, promise, authorize, request, or accept any bribe, kickback, facilitation payment, or improper advantage to influence business decisions.

This includes both direct and indirect payments made through third parties, agents, or intermediaries.

Gifts, hospitality, or promotional items must comply with the Company's Gift and Anti-Bribery policies and shall not be used to improperly influence business relationships.

All financial transactions must be accurately recorded and transparently documented.

5. Fair Procurement Practices

Procurement activities shall be conducted based on objective criteria including quality, price, delivery capability, compliance history, and sustainability performance.

Suppliers shall be selected through fair and transparent evaluation processes.

Conflicts of interest in procurement decisions must be disclosed and managed.

Employees shall not solicit personal benefits from suppliers.

Procurement records shall be maintained for audit and verification purposes.

6. Responsible Sourcing and Labor Standards

The Company is committed to responsible sourcing practices that uphold human rights and fair labor standards.

Suppliers must comply with:

- Prohibition of child labor
- Prohibition of forced or bonded labor
- Non-discrimination principles
- Freedom of association rights
- Safe and healthy working conditions

Where risks are identified within the supply chain, corrective action plans shall be implemented.

7. Transparency and Accurate Representation

All marketing, advertising, and product claims must be truthful, accurate, and not misleading.

FAIR TRADE POLICY

The Company shall not engage in deceptive trade practices, false labeling, counterfeit production, or misrepresentation of product origin, quality, or certification status.

Commercial documentation including invoices, contracts, and customs declarations must be accurate and complete.

8. Trade Compliance and Export Controls

The Company shall comply with applicable export control laws, import regulations, sanctions requirements, and customs laws.

Products shall not be sold to restricted parties or embargoed destinations where prohibited by law.

Trade documentation shall be properly maintained and verified.

Employees involved in export or international sales shall be trained on relevant regulatory requirements.

9. Conflict of Interest

Employees and representatives must avoid situations where personal interests conflict with Company interests.

Any actual or potential conflict of interest must be disclosed to management.

No employee shall use Company position for personal gain.

10. Record Keeping and Financial Integrity

All business transactions must be accurately recorded in the Company's accounting systems.

Off-the-book accounts, falsified records, and unrecorded transactions are strictly prohibited.

Financial records shall comply with applicable accounting standards and regulatory requirements.

Records shall be retained in accordance with document retention policies.

11. Reporting and Whistleblower Protection

Employees, suppliers, and stakeholders are encouraged to report suspected violations of this policy.

Reports may include concerns related to bribery, anti-competitive behavior, labor exploitation, trade violations, or financial misconduct.

The Company prohibits retaliation against individuals who report concerns in good faith.

Reported concerns shall be investigated promptly and impartially.

12. Monitoring and Audit

The Company reserves the right to conduct internal reviews and audits to verify compliance with this policy.

Suppliers may be required to provide documentation supporting fair trade compliance.

Non-compliance may result in corrective actions, contract termination, or legal remedies.

13. Disciplinary and Legal Consequences

Violation of this policy may result in:

- Disciplinary action
- Termination of employment
- Termination of contract
- Civil or criminal penalties
- Legal proceedings

The Company may pursue legal remedies where necessary to protect its interests.

14. Continuous Improvement

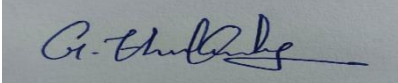
The Company shall periodically review this policy considering changes in trade regulations, competition laws, anti-corruption standards, and stakeholder expectations.

Training programs shall be conducted to ensure awareness of fair trade obligations.

Improvements shall be approved by Top Management.

Declaration

The Company affirms its commitment to conducting business fairly, lawfully, and ethically, and expects all stakeholders to uphold these principles without exception

Prepared by	Approved by
	
ESG Coordinator	Director / MD