

POLICY ON ANTI-BRIBERY AND CORRUPTION

MILLENNIUM HOUSING DEVELOPERS PLC

1. Purpose

Anti-Bribery and Corruption (ABC) Policy is established to provide a clear framework to ensure that the Company conducts all its business activities ethically, transparently, and in full compliance with applicable laws and regulations.

The Company is passionately committed to maintaining the highest standards of integrity, accountability, and ethical conduct in all aspects of its operations and adopts a strict zero-tolerance approach towards bribery, corruption, fraud, and any other improper business practices.

The Company recognizes that bribery and corruption expose the organization to significant legal, financial, operational, and reputational risks, while also undermining stakeholder confidence and long-term sustainable growth. Accordingly, the Policy sets out the principles, controls, responsibilities, and procedures necessary to prevent, detect, report, and appropriately address bribery and corruption across all areas of the Company's operations, activities, and business relationships.

2. Objectives

The objectives of the Anti-Bribery and Corruption Policy are to ensure that the Company conducts all business activities with integrity, transparency, accountability, and ethical responsibility.

The Policy aims to prevent, detect, and address all forms of bribery, corruption, fraud, and improper business practices within the organization and across its business relationships. It further seeks to establish clear standards of conduct and provide guidance to directors, employees, suppliers, contractors, agents, and other stakeholders on complying with applicable anti-bribery and anti-corruption laws, regulations, and internal procedures.

In addition, the Policy promotes a culture of honesty, fairness, and zero tolerance towards bribery and corruption while safeguarding the reputation, assets, and sustainability of the Company.

3. Scope

The Policy applies to:

- Members of the Board of Directors.
- Senior Management.
- All employees (permanent, temporary, and contract).
- All business operations.
- Third parties acting on behalf of the Company.

4. Key Definitions

- **Bribery**

The offering, promising, giving, accepting, or soliciting of anything of value, directly or indirectly, to influence a decision or secure an improper advantage.

- **Corruption**

The abuse of entrusted power for personal or organizational gain, including bribery, fraud, embezzlement, extortion, or unethical conduct.

- **Facilitation Payments**

Small unofficial payments made to expedite routine administrative processes. These are prohibited.

5. Core Principles

- Zero tolerance Policy for bribery and corruption.
- Transparency in all business dealings.
- Accountability at all organizational levels.
- Full compliance with applicable laws and regulations.

6. Responsibilities

- **Board of Directors**

The Board of Directors holds the overall responsibility for ensuring that the Company complies with all applicable legal, regulatory, and ethical obligations. The Board is also responsible for overseeing the effective implementation of the Policy and ensuring that all employees, business associates, and other relevant stakeholders adhere to its requirements.

- **Management**

Management is responsible for the implementation, communication, and enforcement of the Policy across the organization.

Management shall also take necessary steps to promote and maintain a culture of integrity, transparency, accountability, and ethical business conduct within the Company.

- **Employees**

All employees are required to always comply with the Policy and conduct themselves in an ethical and lawful manner.

Employees are also responsible for avoiding, identifying, and promptly reporting any suspicious, unethical, fraudulent, or corrupt activities in accordance with the Company's reporting procedures.

- **Head of Compliance**

The Head of Compliance is responsible for monitoring compliance with the Policy and providing guidance and support to employees and management on related matters. This Officer shall also oversee the review and investigation of reported concerns, suspected violations, or incidents relating to bribery, corruption, fraud, or other unethical conduct.

7. Prohibited Conduct

Employees and representatives must not:

- Offer, give, solicit, or accept bribes, whether in the form of cash, gifts, hospitality, favors, or any other undue benefit.
- Improperly influence, or attempt to influence, any business decision, official action, or commercial outcome through unethical or unlawful means.
- Engage in or facilitate kickbacks, secret commissions, or any concealed or unauthorized payments.
- Use third parties, intermediaries, agents, consultants, suppliers, or other representatives to circumvent or violate the requirements of the Policy.
- Make or authorize facilitation payments or unofficial payments intended to expedite or secure routine governmental or administrative actions.

8. Gifts and Hospitality

- Gifts and hospitality offered or received during business must be reasonable, proportionate, and transparent in nature.
- Gifts and hospitality must not improperly influence, or appear to influence, any business decision, action, or relationship.
- All gifts and hospitality must comply with the Company's internal approval procedures and prescribed limits.
- Cash or cash equivalents must not be offered, given, solicited, or accepted under any circumstances, as they are strictly prohibited under this Policy.

9. Conflicts of Interest

Employees must:

- Avoid situations where personal interests conflict, or may appear to conflict, with the Company's interests.
- Promptly disclose any actual, potential, or perceived conflicts of interest to the appropriate authority.

10. Reporting Concerns

Employees are encouraged to report:

- Suspected bribery or corruption.
- Any violations of the Policy.

Reporting channels include:

- Whistleblowing channel.
- Email or direct reporting to the Compliance Officer.

All reports will be treated confidentially and without retaliation.

11. Training and Awareness

The Company will:

- Provide regular anti-bribery and anti-corruption training to employees and relevant stakeholders.
- Communicate updates and amendments to the Policy in a timely manner.
- Promote a culture of ethical conduct, integrity, and compliance across the organization.

12. Monitoring and Compliance

The Company will ensure:

- Periodic audits and reviews.
- Ongoing risk assessments.
- Strong internal controls to detect and prevent violations.

13. Violations and Disciplinary Action

The consequences for committing or fraudulent or corrupt acts may include, but are not limited to:

- Disciplinary action.
- Demotion.
- Repayment of misappropriated funds and other costs.
- Written warnings.
- Termination of employment.
- Referral to the police or relevant prosecution agencies.

14. Review of Policy

The Policy will be reviewed periodically to ensure continued effectiveness and compliance with applicable laws and best practices.

15. Effective Date of Implementation

The Policy shall come into effect from 1st April 2026.
