



## Foreign Corrupt Practices Act (FCPA)

### Centrolene Network commitment to FCPA

To provide all employees, officers, directors and representatives of Centrolene Pte. Ltd. (“Centrolene”) and its subsidiaries, affiliates and members with all tools and resources necessary to enable, monitor and enforce the Centrolene’s full compliance with the United States Foreign Corrupt Practices Act (“FCPA”) of 1977, as amended. Centrolene is committed to conducting business with honesty and integrity.

The purpose of the Centrolene’s FCPA Policy is to reiterate that commitment, and to explain the specific requirements and prohibitions of the U.S. laws that reinforce and police this commitment, no matter where in the world the Company operates.

FCPA Policy of Centrolene that the company, all of its subsidiaries, affiliates, all employees, officers, directors, subsidiaries, affiliates, members and all persons or entities that act as an agent, representative or advisor to the company or any of its subsidiaries or affiliates shall comply fully with all applicable provisions of the FCPA.

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### Members of Centrolene Network commitment to FCPA

- Represents and agrees that it shall be bound by and abide to all laws and regulations as well as strictly comply with the U.S. Foreign Corrupt Practices Act (“FCPA”), and any other applicable anti-corruption laws as well as the Centrolene Code of Conduct.
- Agrees that neither it nor its owners, employees, officers, directors and representatives and its subsidiaries, affiliates or subcontractors will pay money, promise to pay money, authorize to pay money or offer or promise anything of value to a person in a position of trust to unduly influence the judgment or conduct of that person. There are no exceptions for small amounts or the so called “facilitation-“or “grease-“payments. A person in a position of trust includes any public official, political candidate, political party, party official and private sector employee or individual.
- Warrants that none of its owners, employees, officers, directors, representatives, affiliates or subcontractors has any personal relationships which might unduly influence the services provided by any Service Provider(s).
- Will systematically implement adequate measures and controls ensuring full compliance with applicable anti-corruption laws and the commitments made in this document by Service Provider’s subcontractors and agents, whenever performing services for Centrolene and/or Centrolene’s members or customers of members.
- Agrees to keep accurate books, accounts and records related to Centrolene’s business and that Centrolene has the right to monitor compliance of the Service Provider(s). Service Provider(s) further agrees to make available for review its records and other documentation, and its owners, directors, officers, and employees for interviews, in connection with any services provided to, or on behalf of, Centrolene or its members or its customers of members.
- In the event Centrolene or its Members has in good faith reason to believe a breach of the requirements set out in this form have occurred or may occur, Centrolene may suspend all further services, the membership and payments related thereto, and/or terminate any contractual arrangements with Service Provider(s), in whole or in part with immediate effect.

**Thank you for joining Centrolene Network!**  
***The Future-Ready Network!***