

# Ad Astra Group's Anti-Bribery and Anti-Corruption Policy

RESPECT and APPRECIATION for all high values.  
Preventing cases of bribery and corruption in our business.

This policy, referred to as the Anti-Bribery and Anti-Corruption Policy, sets out the Ad Astra Group commitment to complying with the laws, including but not limited to the Foreign Corrupt Policies Act, the UK Bribery Act, and the Malta Law. These regulations apply to the Ad Astra Group, guided by the Ad Astra framework.

To fulfil our responsibilities concerning, the Ad Astra Group has implemented following measures:

- Maintaining a Compliance Department that is independent, has and develops the necessary expertise, and is in close communication with all relevant departments, including Ad Astra Group and its Board of Directors.
- Maintaining and updating a Risk Assessment to measure and manage bribery and corruption risks in the Group.
- Maintaining and updating the Policy and Procedure framework, that establishes what is and is not allowed, the consequences of not complying with the Policy, and the criteria concerning gifts, hospitality, entertainment, facilitation payments, charitable donations, political contributions, commissions, document keeping, and all other relevant matters.
- Maintaining and updating appropriate controls, tools and systems to monitor on-going customer and vendor activity.
- Maintaining and updating appropriate procedures for reporting suspicious activity internally and externally to the relevant law enforcement authorities as appropriate.
- The maintenance of appropriate records for a minimum of 5 years; and
- Conducting regular training courses for employees and keeping relevant training

records. This policy applies to the entire The Ad Astra Group and any of its subsidiaries.

As an Ad Astra employee, you should:

Never engage in bribery or corruption by offering, giving, accepting, requesting, promising or providing anything of value to or from any public official or to any business partner to gain unfair business advantage of any kind.

Report concerns potential bribery and corruption attempts to the Compliance Department or via the Whistleblowing System.