

AXXELA LIMITED – KNOW YOUR CUSTOMER (KYC) POLICY

1. INTRODUCTION

Axxela is committed to ensuring that its business is conducted in an ethical, risk free and profitable manner, including ascertaining the possibility that a potential business partner may be involved in corrupt practices that portend legal, financial and reputational risks for the Company. Beyond this summary, all employees are required to familiarize themselves with the KYC Policy for fuller understanding.

2. OBJECTIVES

The following procedure is formulated with the aim of:

- i. establishing and verifying the identity of the company's business partners; and
- ii. ensuring Axxela does not engage with any individuals or corporates involved in unethical business practices, including money laundering, corruption and the funding of terrorist activities.

3. PROCEDURE

The company adopts global best practices in conducting its due diligence exercises:

- i. Every prospective business partner is required to complete the Company's due diligence questionnaire received from the relevant engaging department and return same to the Company.
- ii. The questionnaire shall be reviewed by the Legal and Governance department.
- iii. The Legal and Governance department shall review the questionnaire and send a report to the relevant engaging unit.
- iv. The company may requisition additional information/documentation not contained in the questionnaire if necessary to clarify any risk areas.
- v. Based on the outcome of the due diligence, the Legal & Governance department shall issue a written authorization for the engaging department on whether or not to proceed with the transaction.
- vi. If applicable, the report shall include specific recommendations designed to assist the business unit concerned in managing its relationship with the potential business partner if a business relationship comes into existence with the company.
- vii. Based on the principle of impartiality, personnel within the engaging department shall not be assigned to review or issue a report in respect of a due diligence.

The due diligence questionnaire is a part of the requirement for the registration of business partners. The procurement unit must ensure that the due diligence questionnaire is completed by all potential business partners including but not limited to joint venture partners before registering such a business partner with the company.

Although there is no exception to compliance with this policy, in exceptional cases, a written justification for exception from this process may be made to the General Counsel and Company Secretary who will, based on the merits of each case give permission to proceed with a transaction. Such instances may include confirmation from a regulated professional adviser that they have successfully carried out due-diligence on such business partner and are willing and authorized to share such information with the company whenever it is required. The General Counsel and Company Secretary must in all cases give a time frame for the completion of the due diligence exercise.