



LE TRAVENUES TECHNOLOGY LIMITED

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

TABLE OF CONTENTS

| | |
|---|---|
| 1. Introduction..... | 3 |
| 2. Policy Statement..... | 3 |
| 3. Gifts, Entertainment, and Hospitality..... | 3 |
| 4. Prohibited Conduct | 4 |
| 5. Willful Blindness | 4 |
| 6. Business Relationships with Third Parties | 4 |
| 7. Reporting, Protection, and Non-Retaliation | 4 |
| 8. Compliance and Disciplinary Action..... | 5 |
| 9. Responsibility and Review..... | 5 |
| 10. Amendment | 5 |

Le Travenues Technology Limited

Anti-Bribery & Anti-Corruption Policy

1. Introduction

Le Travenues Technology Limited, along with its affiliates and subsidiaries (“**ixigo**” or the “**Company**”), is committed to conducting business in an ethical, transparent, and responsible manner. The purpose of this Anti-Bribery & Anti-Corruption Policy (“**Policy**”) is to set out clear guidelines to prevent bribery and corruption in all forms.

This Policy applies to all individuals worldwide working for ixigo at all levels and grades, including directors, officers, senior executives, employees, and contract staff (collectively, “**Employees**”). It also extends to third parties associated with ixigo, including agents, consultants, suppliers, vendors, contractors, and business partners (“**Third Parties**”).

2. Policy Statement

Bribery and corruption in any form are strictly prohibited. A bribe is any inducement, payment, reward, or advantage offered, promised, given, or received to obtain a commercial, contractual, regulatory, or personal benefit.

- It is illegal to provide or receive a bribe directly or indirectly.
- It is a separate offence to bribe a government or public official.
- A “government” / “public official” includes any elected or appointed official holding legislative, administrative, or judicial authority in any country or territory.

3. Gifts, Entertainment, and Hospitality

Employees and their immediate family members (including spouse, parents, siblings, children, in-laws, step-relatives, or relationships established through marriage/ common law marriage) must not:

- Provide, solicit, or accept cash, cash equivalents, gifts, entertainment, favours, or benefits from competitors, vendors, suppliers, customers, or others who do business with ixigo.
- Accept loans or financial assistance from any person or company seeking business with ixigo, except from recognized financial institutions.

All business relationships must remain professional, transparent, and conducted on an arm's length basis. Any gift, hospitality, or entertainment that could influence, or appear to influence, business decisions is strictly prohibited.

4. Prohibited Conduct

It is **not acceptable** for any Employee (or anyone acting on their behalf) to:

- Accept gifts of any value from a Third Party that is in negotiations with, or submitting proposals to, ixigo.
- Offer, promise, or provide any payment, gift, hospitality, or advantage with the expectation of receiving a business advantage, or as a reward for one already given.
- Offer or give any payment, gift, or hospitality to a government official, agent, or representative to “facilitate” or expedite a routine administrative process.
- Accept or solicit any payment, gift, or advantage from a Third Party where it is known or suspected that the offer is intended to secure a business benefit.
- Threaten, penalize, or retaliate against another Employee who has refused to commit a bribery offence or who has raised concern under this Policy.
- Engage in any activity that might lead to, or suggest, a breach of this Policy.

The above examples are illustrative, not exhaustive.

5. Willful Blindness

Employees must not ignore or deliberately overlook signs of bribery or corruption. “Willful blindness” to such activities, even without direct participation or benefit, will be treated with the same seriousness as intentional misconduct. Appropriate disciplinary action will be taken in such cases.

6. Business Relationships with Third Parties

ixigo expects all Third Parties doing business with the Company to adhere to the principles outlined in this Policy. Continued business relationships are contingent upon cooperation and compliance with these standards. ixigo may terminate any relationship where bribery or corruption is suspected or confirmed.

7. Reporting, Protection, and Non-Retaliation

ixigo encourages openness and requires all Employees and Third Parties to report actual or suspected instances of bribery or corruption in good faith.

- Reports may be made through designated reporting channels established by the Company.
- Employees who refuse to participate in bribery or corruption, or who raise concerns in good faith, will be protected from retaliation or detrimental treatment.
- Even if a concern proves to be mistaken, no action will be taken against the individual if the report was made honestly and in good faith.

8. Compliance and Disciplinary Action

Any violation of this Policy will result in disciplinary action, up to and including termination of employment or contract, and may also result in civil or criminal liability under applicable laws.

9. Responsibility and Review

The responsibility for implementing and monitoring compliance with this Policy rests with ixigo's management.

Employees are individually responsible for reading, understanding, and complying with this Policy.

10. Amendment

The Management reserves the right to modify and/or amend the Policy at any time. The Policy (as amended from time to time), shall be published on the website of the Company at www.ixigo.com.