



**Future Technology Devices International Ltd.  
Singapore Branch**

1 Tai Seng Avenue Tower A #03-06, Singapore 536464  
Tel.: +65 6841 1174  
Web : <http://www.ftdichip.com>

## **Anti-Corruption and Bribery Policy Statement**

This Anti-Corruption & Bribery policy is an integral part of the terms and conditions of employment for employees at Future Technology Devices International Limited (FTDI) and all global locations ("the Organisation").

### **1. Policy statement**

We are dedicated to conducting all business with honesty, fairness, and integrity. We maintain a zero-tolerance stance on bribery and corruption and are committed to implementing and enforcing effective systems to combat these issues.

We will comply with all applicable local laws and regulations related to bribery and corruption in every jurisdiction where we operate.

### **2. Purpose**

The purpose of this policy is to:

- Define our responsibilities as well as those of individuals working for us, in maintaining our stance on bribery and corruption.
- Provide information and guidance to individuals working for us on how to identify and address issues related to bribery and corruption.

Bribery and corruption can lead to severe penalties, including up to ten years in prison. If the Organisation is found to have engaged in corrupt practices, it could face unlimited fines, exclusion from public contracts and significant reputational damage.

As a result, we take our legal obligations very seriously.

In this policy, a third party refers to any individual or organisation you interact with during your work for us. This includes current and potential clients, customers, suppliers, distributors, business contacts, agents, advisers as well as government and public bodies, including their advisers, representatives, officials, politicians and political parties.

### **3. What is bribery?**

A bribe is an offer, promise, or provision of an inducement or reward to obtain any commercial, contractual, regulatory or personal benefit.



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#### **4. Gifts and Hospitality**

The giving and receiving of gifts and hospitality is permissible when it meets the following criteria:

- It is not intended to influence a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits.
- It complies with local laws.
- It is given in the name of the Organisation, not personally
- It does not involve cash or cash equivalent (such as gift certificates or vouchers)
- It is appropriate to the occasion, considering local customs and the reason for the gift.
- It is not conducted secretly.
- No gifts should be offered to or accepted from government officials or representatives or politicians or political parties, without the prior approval of the management.

We recognise that the practice of giving business gifts differs across countries and regions, and what may be customary and acceptable in one area might not be suitable in another.

The key consideration is whether in all the circumstances, the gift or hospitality is reasonable and justifiable. It is crucial to always assess the intention behind the gift to ensure it aligns with our commitment to ethical business practices.

#### **5. Prohibited Conduct**

It is strictly prohibited for you (or anyone acting on your behalf) to:

- Give, promise or offer a payment, gift or hospitality with the expectation or hope of receiving a business advantage or as a reward for a business advantage already provided.
- Give, promise, or offer a payment, gift, or hospitality to a government official, agent, or representative to facilitate or speed up a routine procedure.
- Accept a gift, hospitality or payment from a third party if you know or suspect it is being offered in exchange for a business advantage.
- make or accept any form of facilitation payments or "kickbacks"
- threaten or retaliate against another employee who has refused to engage a bribery offence or who has raised concerns under this policy; or engage in any activity that might lead to a breach of this policy.



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## **6. Donations**

We do not make contributions to political parties. Any charitable donations must be legal, ethical and approved by management.

## **7. Your Responsibilities**

You are required to read, understand and comply with this policy. The prevention, detection, and reporting of bribery and other forms of corruption are the responsibility of everyone working for or under our control. All employees must refrain from any activities that could lead to, or suggest, a violation of this policy.

If you believe or suspect that a conflict with this policy has occurred or may arise in the future, you must notify your line manager as soon as possible. For example, if a client or potential client offers you something to gain a business advantage with us or suggests that a gift or payment is necessary to secure their business, it must be reported immediately.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We also reserve our right to terminate our contractual relationships with any individuals or third parties who breach this policy.

## **8. Record-keeping**

We require the maintenance of accurate and complete financial records and internal controls.

You must declare and maintain a written record of all hospitality or gifts accepted or offered.

You must ensure that all expense claims related to hospitality, gifts or expenses incurred on behalf of third parties are submitted in line with our expenses policy and include a clear record of the purpose of the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties such as clients, suppliers and business contacts must be prepared and maintained with strict accuracy and completeness. It is strictly prohibited to maintain any "off-book" accounts for the purpose of facilitating or concealing improper payments.

## **9. Raising Concerns**

You are encouraged to raise concerns about potential malpractice as soon as possible. If you are unsure whether a particular action constitutes bribery or corruption or if you have any other queries, please discuss them with your line manager.



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## **10. Protection**

We understand that employees who refuse to accept or offer a bribe or those who raise concerns or report another's wrongdoing, may worry about potential repercussions. We are committed to fostering an open environment and will support anyone who raises genuine concerns in good faith under this policy, even if their concerns later prove to be incorrect.

We are committed to ensuring that no one faces any detrimental treatment for refusing to engage in bribery or corruption or for reporting their concerns in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have experienced any such treatment, you should inform your line manager immediately. If the matter is not remedied and you are an employee, you should formally raise it through our Grievance Procedure.

## **11. Training and communication**

This policy is an integral part of the induction process for all new employees.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

## **12. Responsibility for the policy**

The board of directors holds overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all individuals under our control comply with it.

Management at all levels is responsible for ensuring that their team members are informed of and understand this policy.

## **13. Monitoring and review**

The Company will monitor and review the implementation of this policy, regularly assessing its suitability, adequacy and effectiveness. Any improvements identified will be made promptly. Internal control systems and procedures will undergo regular audits to ensure they effectively counter bribery and corruption.

For and on behalf of Future Technology Devices International Limited

A handwritten signature in black ink, appearing to read "Supriya", written over a horizontal line.

HR Department