

Prevention of bribery and corruption policy

The Group's policy is to conduct all of its business honestly and ethically and the Group takes a zero-tolerance approach to bribery and corruption. The Group takes its responsibility to adhere to relevant legislation, rules, and guidance extremely seriously.

The Group runs its business with integrity and the Group expects its employees and other associated third parties to work together to ensure that it remains untainted by bribery or corruption.

The Group complies with the laws relevant to countering bribery and corruption in the jurisdictions in which it operates and other legal acts that may be applicable.

The Group implemented the Anti-Bribery and Corruption (ABC) Policy that sets out the Group's position on bribery and corruption.

The Policy provides corporate rules and guidance for all Group employees, executive and governing bodies, representatives, and other business partners of the Group for preventing corruption in the form of bribery, which is commonly described as involving the offer, promise, request, acceptance, or transfer of anything of value either directly or indirectly to or by an individual, to improperly induce, influence, or reward the performance of a function or an activity.

In particular, the Policy provides rules for the treatment of gifts, other types of hospitality and expenses, donations and marketing sponsorship, third-party ABC risk assessment, employment, and work experience practices.



The Policy defines the Group's risk-sensitive approach to the development and implementation of the Policy and to combating bribery and corruption to reasonable design rules, procedures, and controls to prevent and detect acts of bribery or corruption.

The Group prohibits bribery and corruption and facilitation payments or "kickbacks" in all forms, whether direct or indirect, no matter what the amount and all Group employees are expected to act with the highest standards of integrity in all business dealings whether with public officials or private sector business partners. Bribery and corruption are not tolerated, regardless of the status of the recipient.

The Policy applies to all its employees and third parties, including those having business relationships or acting on behalf of the Group.

The Group expects all employees to be aware of the relevant obligations and to conduct the Group's business in accordance with the Policy and the Group's Code of Conduct and to report any observed bribery and other forms of corruption in connection with our business.

Any Group employee breaching the Policy may be subject to disciplinary action, dismissal and/or reporting to the relevant authorities, in accordance with applicable laws.

The Group's ABC compliance program forms part of the internal control system and consists of the following elements:

1. ABC risk assessment and management
2. ABC Policy and Code of Conduct
3. Third-party ABC due diligence
4. Internal control, roles, responsibilities, reporting and independent internal audit
5. Group-wide training program
6. Record-keeping

The Group's ABC compliance governance is ensured by the following means:

1. Group-level internal documentation
2. Risk Committee
3. Operating entity level internal documentation
4. Group-wide oversight and governance framework executed by the headquarter function
5. The technical solution of the third-party ABC risk assessment
6. Group-wide compulsory training program for all employees and other persons performing contract work for the Group.

