



ANTI-FRAUD, ANTI-BRIBERY & ANTI-CORRUPTION POLICY

1. INTRODUCTION

- 1.1 Hong Leong Asia Ltd. (“**HLA**”) and its subsidiaries (collectively, the “**HLA Group**” or a “**HLA Group company**”) value our reputation and we are committed to comply with relevant laws and regulations while maintaining the highest possible ethical standards in all our business activities. We recognise that the risks of fraud, bribery and corruption are a growing concern for corporate and public life in many countries across the world.
- 1.2 HLA, in our ongoing efforts to keep high ethical standards and with a view to upholding our position against any form of fraud, bribery and corruption, has established this Anti-Fraud, Anti-Bribery & Anti-Corruption Policy (the “**FBC Policy**”), which should be read in conjunction with our Code of Business Conduct and Ethics (the “**Code**”) and all other relevant HLA Group’s policies that may be issued from time to time.

2. PURPOSE AND POLICY STATEMENT

- 2.1 The purpose of the FBC Policy is to set out the responsibilities of the HLA Group’s functions and business units in observing and upholding HLA’s position against fraud, bribery and corruption. This FBC Policy applies to the HLA Group and our suppliers, contractors and business partners, as well as all directors, officers and employees, of the HLA Group (collectively referred to as the “**Employees**”).
- 2.2 The HLA Group and Employees must, at all times, comply with the FBC Policy and all relevant anti-fraud, anti-bribery and anti-corruption laws including the Singapore Prevention of Corruption Act 1960 (the “**Act**”); the People’s Republic of China (“**PRC**”) Criminal Law (which punishes criminal acts of bribery); the PRC Anti-Unfair Competition Law (which punishes acts of bribery undertaken by private parties for a business purpose); the United Kingdom Bribery Act 2010; the United States Foreign Corrupt Practices Act of 1977; the Malaysian Anti-Corruption Commission Act 2009 and all other similar laws and regulations in all the countries where the HLA Group conducts its business.



- 2.3 Specifically, the Act:
- 2.3.1 extends the crime of bribery to cover all private sector transactions (and is not limited to transactions involving public officials and agents);
 - 2.3.2 defines a range of corruption offences;
 - 2.3.3 has significant extra-territorial reach; and
 - 2.3.4 includes criminal penalties for individuals and organisations.
- 2.4 The Act contains a number of offences, including:
- 2.4.1 offering, promising or giving a bribe;
 - 2.4.2 soliciting, receiving, agreeing to receive or accepting a bribe; and
 - 2.4.3 bribing a foreign public official to obtain or retain business.
- 2.5 For the purposes of this FBC Policy, a bribe is the giving or accepting any financial or other advantage (including any gratification (as defined in the Act) or “kickback”), to induce the recipient (for themselves or any other person) to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage. An advantage includes (without limitation) money, gifts, loans, fees, hospitality, services, discounts, and the award of a contract or anything else of value.
- 2.6 The bribery offence may be established notwithstanding that the person was not able to complete the corrupt act requested or to put the corrupt intention into action.
- 2.7 HLA adopts a zero-tolerance approach to fraud, bribery and corruption of any form. All Employees must adhere to and should familiarise themselves with this FBC Policy, the Code, and all other relevant anti-fraud, anti-bribery, anti-corruption and related policies of the HLA Group as may be in force from time to time. **Failure to comply could give rise to disciplinary action against, or the dismissal, of the Employee.**



- 2.8 This FBC Policy shall apply even in circumstances and in countries where the giving and receiving of bribes or such corrupt payments may be common local practice or custom. It is not a valid defence against a charge of corruption to show that the bribe in question is customary in any profession, trade, vocation or calling, industry, jurisdiction or country. Bribery which is committed overseas may still be caught under Singapore's anti-corruption laws where an offence is committed by a Singapore citizen in any place outside Singapore, he/she may be dealt with in respect of that offence as if it had been committed within Singapore.

3. SCOPE OF THIS FBC POLICY

- 3.1 An Employee, whether for themselves or any other person, shall not:
- 3.1.1 give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
 - 3.1.2 give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
 - 3.1.3 accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return;
 - 3.1.4 accept hospitality from a third party that is unduly lavish or extravagant under the circumstances;
 - 3.1.5 offer or accept a gift to or from government officials or representatives, or politicians or political parties;
 - 3.1.6 give or make facilitation payments to government officials (typically used for securing or accelerating routine government procedures);
 - 3.1.7 threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this FBC Policy;
 - 3.1.8 authorise or provide travel benefits, gifts, entertainment, or political contributions for the benefit of a government official or other business contact;



- 3.1.9 enter into a consultant or sales agent agreement or arrangement that will result in contacts with government officials or other business contacts without conducting due diligence, obtaining the required internal approvals, retaining all due diligence records in accordance with the existing record retention policy, and accurately recording all related payments on the books and records of any HLA Group Company;
- 3.1.10 make charitable contributions or sponsorships on behalf of the HLA Group to organisations that might be disguised as vehicles or arrangements for obtaining bribes or corrupt payments. HLA will only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without compliance with the HLA Group's guidelines on donations;
- 3.1.11 make any incomplete, false or inaccurate entries on the books and records of any HLA Group company;
- 3.1.12 forge or alter documents;
- 3.1.13 obtain monetary benefits with insider knowledge of company activities;
- 3.1.14 disclose confidential and proprietary information to external parties;
- 3.1.15 engage in inappropriate use, and the deliberate destruction of company records and assets;
- 3.1.16 knowingly withhold or conceal information concerning impropriety committed by another person within the HLA Group; or
- 3.1.17 engage in any other activity that might lead to a breach of this FBC Policy.

4. RESPONSIBILITIES

4.1 Who needs to comply with this FBC Policy?

Unless otherwise stated in this FBC Policy or the Code, all Employees of the HLA Group must comply with the FBC Policy, subject to any regional variations. This FBC Policy can be found on the HLA intranet and corporate website.



4.2 The prevention, detection and reporting of bribery is the responsibility of all Employees throughout the HLA Group. If any instance of bribery is identified, remedial steps will be taken immediately. Managers should ensure all their Employees are aware of this FBC Policy and their responsibilities to act in accordance with its procedures. Notably each person subject to this FBC Policy must:

- 4.2.1 **Know their counterparty** – carry out adequate due diligence to ensure background checks have been completed on any third party to identify involvement in any current or previous corrupt activities.
- 4.2.2 **Prevent bribery** – not accept or give any bribe, whether cash or other inducement, as stated above.
- 4.2.3 **Report** – report immediately any instance of bribery in accordance with this FBC Policy and related guidance.
- 4.2.4 **Record keeping** – keep all records relating to this FBC Policy, in compliance with the existing record retention policy, such as details of all due diligence checks or, if an Employee is asked to make a payment on behalf of any HLA Group company, the Employee should always be aware of what the payment is for and always ask for and retain a receipt which details the reason for the payment. The same applies for any gifts. For additional information and guidance on gifts and hospitality, refer to the Code.
- 4.2.5 **Training** – carry out any training assigned to embed and enforce these policies.

Managers should ensure all their Employees are aware of this FBC Policy and their responsibilities to act in accordance with its standards and that failure to do so will be viewed as a serious disciplinary issue.

5. RAISING CONCERNS AND SEEKING GUIDANCE

5.1 An Employee should contact his/her manager (if appropriate) and Legal and Compliance Department if he/she has any questions or needs clarification in relation to this FBC Policy or any anti-fraud, anti-bribery or anti-corruption compliance.



- 5.2 If an Employee suspects or has evidence of any unlawful activity, the Employee must promptly report this through the whistleblowing reporting channel. Employees should read the Whistleblowing Policy in conjunction with this FBC Policy. A copy of the Whistleblowing Policy can be found on HLA's intranet and corporate website.
- 5.3 Our Internal Audit Department has the primary responsibility to investigate all suspected acts of corruption falling under the FBC Policy. The investigation may be assisted by senior management personnel from the Legal and Compliance Department, Human Resource Department, and/or other relevant departments as appropriate.
- 5.4 If the investigation substantially confirms the occurrence of acts of corruption, the Head of Internal Audit will issue the relevant reports to the Audit and Risk Committee and senior management as appropriate.
- 5.5 Employees who are found to be in violation of this FBC Policy may be subject to potential criminal and civil liabilities. This may include imprisonment and fines, in addition to any appropriate disciplinary actions.
- 5.6 Employees who are not directly involved in committing any violation of this FBC Policy but have knowledge of such violations committed by other persons and conceal such information from HLA or take detrimental actions against others who report such violations will also be subject to disciplinary action.