

# Genting Anti-Bribery and Corruption Policy

## Policy Statement

The Genting Group is committed to conducting its business professionally, ethically and with the highest standard of integrity. The Group practices a **zero-tolerance approach** against all forms of bribery and corruption, and upholds all applicable laws in relation to anti-bribery and corruption.

## General

### 0.1 Overview

In line with the Group's policy against bribery and corruption, Genting Berhad (the "**Company**") has put in place the Anti-Bribery and Corruption System ("**ABCS**") to consolidate and manage elements, policies, objectives and processes in relation to bribery and corruption risks in the Group.

This Anti-Bribery and Corruption Policy ("**ABCS Policy**") aims to set out the main principles, policies and guidelines that the Company practices in relation to anti-bribery and corruption. This ABCS Policy is not meant to cover all possible situations that may arise in the course of business. This ABCS Policy is designed to provide a frame of reference and guidance to all persons working for and with the Company in observing and complying with the applicable laws on anti-bribery and corruption.

### 0.2 What is "bribery" and "corruption"?

"Bribery" and "corruption" refer to the offering, promising, giving, accepting or soliciting of an undue advantage or gratification of any value which can be financial or non-financial, directly or indirectly, and irrespective of location, in violation of applicable law as an inducement or reward for a person acting or refraining from acting in relation to the performance of the person's duties.

## Gifts

**No gift can be offered in return for any business advantage for the Company. No gift can be offered or received as a disguise for a bribe. All employees and directors of the Company are expected to exercise proper care and judgment, taking into account pertinent circumstances and the business context, applicable laws and cultural norms.**

1.1 In connection with the business of the Company, all employees and directors of the Company are **strictly prohibited** from receiving and/or offering the following, whether directly or indirectly:-

- (a) Any gift of cash or cash equivalent, including vouchers, discounts, coupons and shares;
- (b) Any gifts involving parties engaged in a tender or competitive bidding exercise involving the

Company;

- (c) Any gifts that comes with a direct/indirect suggestion, hint, understanding or implication that some expected or desirable outcome for or from the Company is required in return for the gift;
- (d) Any gift that would be illegal or in breach of applicable laws on bribery and corruption; and
- (e) Any gift which is lavish and/or excessive or may adversely tarnish the reputation of the Company.

## Hospitality and Entertainment

**The Company recognizes that it is a common practice to provide modest hospitality and entertainment to build and foster business relationships. However, all hospitality and/or entertainment, if received in connection with the Company's business, must be unsolicited and must not be perceived as a form of bribery. It must not be received if it could affect or be perceived to affect the outcome of the Company's business transactions or is not reasonable or bona fide business expenditure.**

- 2.1** The Company **strictly prohibits** the giving of hospitality and/or entertainment in return for any business advantage for the Company, and the receiving of hospitality and/or entertainment which may be perceived as a bribe. The giving or receiving of hospitality and/or entertainment in the following situations is prohibited:-
- (a) Any hospitality and/or entertainment provided or received with a view to improperly cause undue influence on any party in exchange for some future benefit or result to or from the Company;
  - (b) Any hospitality and/or entertainment provided or received with a direct/indirect suggestion, hint, understanding or implication that some expected or desirable outcome for or from the Company is required;
  - (c) Any hospitality and/or entertainment involving parties engaged in a tender or competitive bidding exercise involving the Company;
  - (d) Any hospitality and/or entertainment provided or received that would be illegal or in breach of any applicable laws;
  - (e) Any hospitality and/or entertainment that are sexually oriented; and
  - (f) Any hospitality and/or entertainment provided or received that would be perceived as lavish or excessive or may adversely tarnish the reputation of the Company.

## Donations and Sponsorships

**As a responsible corporate citizen, the Company is committed to contributing to the well-being of the people and the country where it operates. However, the Company recognises that providing donations and sponsorships can pose a bribery risk as it involves payments to a third party without tangible return. As such, all donations and sponsorships are to be made in accordance with the Company's policies.**

- 3.1 As part of its commitment to corporate social responsibility, the Company provides such assistance in appropriate circumstances and in an appropriate manner. However, such requests must be carefully examined for legitimacy and not be made to improperly influence a business outcome for the Company.
- 3.2 All sponsorships and donations by the Company must comply with the following principles:
- (a) ensure such contributions are allowed by applicable laws;
  - (b) obtain all the necessary internal and external authorizations in accordance with the Company's Limits of Authority;
  - (c) be made to legitimate entities having an adequate organisational structure for proper administration of the funds;
  - (d) be accurately stated in the Company's accounting books and records;
  - (e) not made, directly or indirectly, to a recipient as a way of influencing, or could reasonably be perceived as influencing or obtaining an advantage for the Company in business transactions;
  - (f) not used as a means to cover up a bribery; and
  - (g) not otherwise tarnish the reputation of the Company.
- 3.3 Due diligence must be conducted to ensure that the requests are legitimate.

## Political Contribution

**As a general rule, the Company does not make political contributions, whether in the form of direct financial support, pledges or through the use of its assets to support any political candidate, incumbent or party. In limited circumstances, the Company may make political contributions in countries where such contributions are permitted by law.**

- 4.1 Where political contribution is permitted by applicable law and provided the Company complies with the principles set out in Section 3.2 above, such contribution must be approved by the Board of Directors.
- 4.2 The Company encourages employees to participate in the political election process by voting. Employees may choose to make personal political contributions as appropriate within the limits established by applicable law. Under no circumstances will any employee be compensated or reimbursed in any way by the Company for a personal political contribution.

## Facilitation Payment and/or Extortion Payment

The Company ***strictly prohibits*** giving, whether directly or indirectly, any facilitation payments or extortion payments in return for any business advantage for the Company.

### 5.1 What is "facilitation payment"?

"Facilitation payment" is an illegal or unofficial payment made in return for services which the payer is legally entitled to receive without making such payment.

This usually occurs as a payment to a public official or person who has authority to grant certification, licenses, permissions or permits, in order to secure or expedite such process. It is important to note that facilitation payments do not necessarily involve cash or other financial asset, it may be in the form of any advantage with the intention to influence a decision or an outcome.

### 5.2 What is "extortion payment"?

Extortion is the demanding of a gratification, whether or not coupled with a threat if the demand is refused.

## Third Parties

- 6.1 The Company expects all third parties dealing with the Company to share our commitment to zero tolerance against corruption by complying with all policies/SOP/guidelines in relation to the ABCS and all applicable anti-corruption laws. All third parties including suppliers, vendors, contractors, and service providers performing work or services for or on behalf of the Company will be provided with the Code of Business Conduct for Third Parties and shall be required to acknowledge and confirm their compliance with the Code of Business Conduct for Third Parties and all applicable anti-corruption laws.
- 6.2 It is the Company's policy to conduct appropriate and adequate due diligence on all third parties before entering into any formal arrangements.

## Employees

- 7.1 The Company upholds the principle of workforce diversity, equal opportunity, non-discrimination and fair treatment in all aspects of employment. As such, the recruitment of employees shall be done in accordance with the established standards and procedures.
- 7.2 It is the Company's policy that appropriate and adequate due diligence shall be conducted on all prospective employees. The type of due diligence conducted on prospective employees will be based on the risk profile of the position.
- 7.3 During the course of employment, all Company employees and directors shall:
- (a) comply with all policies/SOP/guidelines in relation to the ABCS;
  - (b) attend trainings on the ABCS;

- (c) sign an Integrity Pledge to confirm their commitment to uphold the Company's anti-bribery policies and comply with anti corruption laws; and
- (d) declare any actual or potential conflict of interest.

## Whistleblowing

- 8.1** The Company encourages all its employees, business partners and customers to report any real and/or suspected bribery or corruption.
- 8.2** Anyone who makes a report, complaint or disclosure about any real and/or suspected bribery or corruption is given the protection of confidentiality and will not suffer any detrimental action for making the report. This is provided that the report, complaint or disclosure is made in good faith, belief and without malicious intent.
- 8.3** The Company has established a whistleblowing channel, which is designed to facilitate and allow all Company employees, business partners and customers to report any real and/or suspected bribery or corruption. The following is the dedicated email for whistleblowing: [whistle@genting.com](mailto:whistle@genting.com)

## Violation and Investigation

- 9.1** Any conduct which is non-compliant or in violation of the ABCS and/or policies/SOP/guidelines in relation to the ABCS is taken seriously and is subject to disciplinary action (including termination of employment) and criminal prosecution.
- 9.2** Where non-compliance of the ABCS is detected or a complaint is received, the Whistleblower Hotline Committee shall oversee the investigation process.

## Monitoring and Review

### **10.1 Audit**

- (a) An internal audit review of the ABCS shall be carried out at least once a year to evaluate the compliance by the respective departments and business units with the ABCS and to identify areas for improvement.
- (b) Material findings will be ultimately presented to the Board of Directors.
- (c) A copy of the findings shall also be forwarded to the Compliance Officer for monitoring and further action, if necessary.

### **10.2 Risk Assessment**

- (a) The Risk Management Department oversees and facilitates assessment of bribery and corruption risks of the Company. A risk assessment in relation to bribery and corruption risks shall be conducted on a regular basis.
- (b) A report on the risk assessment shall be presented ultimately to the Board of Directors for review.

- (c) In addition to the risk assessments conducted on a regular basis by the respective departments and business units, the Risk Management Department shall carry out a comprehensive risk assessment of the Company's exposure to bribery and corruption risk at least once every 3 years, with intermittent assessments conducted as necessary when (i) there is a change in law or circumstance of the business, (ii) there is a material change in the environment or circumstances in which the Company is operating; or (iii) the current policies and procedures are found to be inadequate.