GuocoLand Malaysia
A Member of the Hong Leong Group

GLM Group Anti-Bribery and Corruption Policy

Why do we have this Policy?

GuocoLand (Malaysia) Berhad and its subsidiaries ("**GLM Group**") commit to conducting business ethically in compliance with the Malaysian Anti-Corruption Commission Act 2009, or its equivalent and all applicable anti-bribery and corruption laws of every country in which GLM Group operates.

GLM Group does not condone any form of bribery and corruption. This Anti-Bribery Corruption Policy ("**ABC Policy**"), which must be read in conjunction with the GuocoLand Group's Code of Conduct & Ethics, serves to provide guidance on how to prevent, deal with and combat bribery and corrupt activities and issues that may arise in the course of business.

Who does this Policy apply to?

This ABC Policy applies to all employees, directors (executive and non-executive) and any business partners, which includes existing and potential customers, vendors, contractors, partners, government officials and other business associates (collectively, "**Applicable Persons**").

What must you NOT do?

a) To ensure that our business dealings are conducted with integrity, an employee is strictly prohibited from accepting any gratifications from any business partners (i.e. existing and potential customers, vendors, contractors, partners, government officials and other business associates).

b) The term "gratification" as defined under the Malaysian Anti-Corruption Commission Act 2009, or its equivalent, includes:

   i) money or any gift, loan, fee, reward, commission, valuable security or other property or interest in property of any description, whether movable or immovable;

   ii) any office, employment or contract;

   iii) any payment, release, discharge or liquidation of any loan, obligation or other liability whatsoever, whether in whole or in part;

iv) any other service, favour or advantage of any description whatsoever,

v) including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary or penal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and

vi) any offer, undertaking or promise of any gratification within the meaning of paragraphs i), ii), iii) and iv).

c) An employee is strictly prohibited from soliciting gifts or seeking favours or preferential terms for his own personal benefits from any business partner whom he has dealings within an official capacity.

d) Under no circumstances may an employee offer gratification to any person or company for the purpose of influencing such person or company in obtaining or retaining business for or directing business to the Group. Even when an offer of gratification carries no intention of improper influence, it should be ascertained that the intended recipient is permitted by his employer/ principal to accept it under the relevant circumstance before the gratification is offered.

e) No gratification should be offered to any public servant (including government authorities) as a reward for or inducement to his/ her performing any act in his/ her official capacity or his/ her showing any favour or providing any assistance in business dealing with the authorities.

What is acceptable?

a) Employees could consider accepting voluntarily given corporate gifts only if:

i) the acceptance will not influence the work performance or judgment of the employee receiving it in dealings with the giver;

ii) the recipient will not feel obliged to do something in return for the offer;

iii) the recipient is able to discuss the acceptance openly without reservation;

iv) such momentos and souvenirs have no commercial value such as diaries, calendar, memo pads, year planner, etc.; or

v) the nature (advertising, promotional or customary) and the value (subject to a maximum of RM350) of the corporate gifts are such that refusal could be seen as unsociable or impolite, bringing disrepute to the Hong Leong name.

b) In such an event, the employee must declare using the Gift Declaration form and submit the form and gifts to HR Department for disposal. Usually these shall be used for staff functions, or, in the case of perishable items, they shall be opened and distributed to the employees.

c) In case of doubt, the recipient should refer the matter to their immediate superior/ Department Head or HR Department for advice and instruction.

d) Any commissions, favourable terms conceded, or payments made by employees when conducting business must be in accordance with the policies of the Group in force at the time or in line with current market practice.

e) When recommending suppliers, contractors or other service providers to the Group, employees must disclose any personal interest or possible benefit (e.g. if a relative is an owner or interested in that supplier). All such arrangements must be entered into on the best terms available and be in the best interests of the Group.

What are the penalties?

Engagement in any bribery or corrupt practices or activities will result in severe negative consequences. The employee involved may face disciplinary actions, including immediate dismissal from employment and/or referral to relevant law enforcement authorities.

What else should you do?

All Applicable Persons are responsible for refraining from and preventing any instance of bribery or corruption, and for reporting any concern or suspicion so that GLM Group can identify the risks and conduct investigations as may be necessary. Reports of any concern of suspicion may be made in the following manner:

HEAD OF INTERNAL AUDIT
Level 13, Guoco Tower
Damansara City
No. 6, Jalan Damanlela
Bukit Damansara
50490 Kuala Lumpur, Malaysia
Email: glm-iahead@guocoland.com

HEAD OF HUMAN RESOURCES
Level 13, Guoco Tower
Damansara City
No. 6, Jalan Damanlela
Bukit Damansara
50490 Kuala Lumpur, Malaysia
Email: glm-hrhead@guocoland.com

GROUP INTERNAL AUDITORS
1 Wallich Street
#31-01
Singapore 078881
Email: whistle-blowing@guocoland.com

If you have any doubt, please contact the Head of Internal Audit or Head of Human Resources immediately.

An electronic version of this ABC Policy is available at http://www.guocoland.com.my/

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