

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY



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1.0 OBJECTIVE

1.1 The objective of this Policy is to

- 1.1.1 set out the responsibilities of CJ Century Group of Companies (hereinafter referred to as “the Company”), and of those working for the Company, in observing and upholding its position on bribery and corruption; and
- 1.1.2 provide information and guidance to those working for it on how to recognize and deal with bribery and corruption issues.

2.0 SCOPE

This policy applies to all companies within the CJ Century Group. This includes all individuals working at all levels and grades, employees (whether permanent, contract or temporary), business partners, consultants, contractors, trainees, interns, agents, suppliers, customers, any third party or any other person that is associated with the Company, or any of its subsidiaries or their employees, wherever located (collectively referred to as employee in this policy).

This Anti-Bribery and Anti-Corruption Policy must be read together with the Code of Conduct and Ethics.

3.0 PRINCIPLES

- 3.1 The Company believes that all relationships should be founded on principles of good governance such as integrity, accountability, fairness and no tolerance towards bribery and corruption.
- 3.2 The Company expects that our employees conduct their business in accordance with the highest ethical standards. The Company’s employees must strictly comply with all laws and regulations on bribery, corruption and prohibited business practices.
- 3.3 In this Policy, “third party” means any individual or organization we encounter at work, including but not limited to existing and potential customers, suppliers, business contacts, agents, consultants, contractors, subcontractors and government authorities.
- 3.4 All employees are to be governed by the Company’s Code of Conduct and Ethics.

4.0 DEFINITIONS

- 4.1 Bribery : An act of taking or receiving something with the intention of influencing the recipient in some way favourable to the party providing the bribe.
- 4.2 Corruption : Dishonest activity in which a director, employee or contractor of the company acts contrary to the interest of the Company and abuses his/her position of trust in order to achieve personal gain or advantage for himself/ herself or for another person or entity.

4.3 Gifts : Items or benefits receive from any business related third parties (e.g. suppliers, contractors etc.)

5.0 SOLICITATION, BRIBERY AND CORRUPTION

5.1 Employee must not directly or indirectly promise, offer, grant or authorise the giving of money or anything else of value, to government officials, officers of private enterprises and their connected persons to obtain or retain a business or an advantage in the conduct of business.

5.2 These include:

5.2.1 Commissions that you have reason to suspect will be perceived as bribes or have reason to suspect will be used by the recipient to pay bribes or for other corrupt purposes; and

5.2.2 Facilitation payments ('grease payments') which are regarded as payments to government officials to gain access, secure or expedite the performance of a routine function they are in any event obligated to perform. The Company does not allow facilitation payments to be made. Employee must inform the appropriate compliance personnel when encountered with any request for a facilitation payment. If the employee has made any payment which could possibly be misconstrued as a facilitation payment, the appropriate compliance personnel must immediately be notified, and the payment recorded accordingly.

5.3 Employees must also refrain from any activity or behaviour that could give rise to the perception or suspicion of any corrupt conduct or the attempt thereof. Promising, offering, giving or receiving any improper advantage in order to influence the decision of the recipient or to be so influenced may not only result in disciplinary action but also criminal charges. All counterparts (when representing the Company) are under a duty not to promise, offer or give any improper advantage on behalf of the Company. Directors and employees must endeavour to ensure that these counterparts do not promise, offer or give any such improper advantage on behalf of the Company.

6.0 DEALING WITH GOVERNMENT AUTHORITIES, POLITICAL PARTIES AND INTERNATIONAL ORGANISATIONS

The Company strives to build transparent and fair relationships with government agencies, public officials and international organisations. Appropriate action must be taken to comply with the applicable laws and regulations in all countries in which the Company operates, as well as the Company's relevant policies and procedures.

7.0 GIFTS OR FAVOURS / HOSPITALITY

7.1 It is the policy of the Company that no employee or any member of his immediate family will accept any form of gifts or favours from contractors, suppliers, clients/customers, or any other party having business dealings with the Company.

7.2 However, in such circumstances where it is customary to do so, employees shall be permitted to accept such gifts of nominal value or favours provided that such gifts or favours are not extended and/or accepted for the purpose or with the intention of;

- 7.2.1 Influencing any present or future act or decision by that employee.
 - 7.2.2 Inducing such employee to perform or omit any act in violation of his proper duties and responsibilities.
 - 7.2.3 Inducing such employee to use or direct any other person to use his influence with a government, or any of its representatives, divisions or agencies to affect or influence any act or decision of any such government, representative, division or agency and in any or all of the above cases, for the purposes of expediting, benefiting, prejudicing or affecting in any way whatsoever whether directly or indirectly the business dealings or relationship of the gift giver with the Company.
- 7.3 For the purpose of this section, 'Nominal Value' of a gift shall be defined as the sum of the gift/s having the aggregate monetary value of not more than Ringgit Malaysia Five Hundred only (RM500.00). Employees shall report to their respective Head of Division all gifts or favours received which exceed the nominal value.
- 7.4 Employees are required to declare any gift(s) received regardless of the amount. However, it is not applicable for Corporate Premium Items received. For this instance, Corporate Premium Items are gifts that carries the company logo or identity of the company from the giver.
- 7.5 Employees are required to declare in receiving any hospitality or event-related gift(s) (e.g. concerts, sports event, SPA, sponsor for vacation etc.)
- 7.6 Employees are required to complete and submit the "Gift Declaration Form" when receiving any gift(s). In the event of receiving multiple Gifts/Benefits from the same party, one form is to be used for declaration of all gifts from that particular party. You are requested to attach additional list if the space is insufficient. Separate forms are to be used when the decision of treatment of the multiple gifts from the same party is different.
- 7.7 All employees shall, if in doubt as to the nature or purpose of the gift or favour consult the Head of Human Resources and Administration Department who shall decide, either in consultation with or through his own accord, the course of action in respect of such gift or favour.
- 7.8 Gifts which cannot be accepted by the employee shall be returned to the donor or if such return is not possible or impracticable, retained by the Company for distribution to recognized charitable organization, the Company's Sports and Recreational Club or for general distribution to the Company's employees.

8.0 ENTERTAINMENT

- 8.1 Employees and their family members shall not accept any gratuitous entertainment from any of the Company's clients, customers, suppliers, contractors or any party with whom the Company has business dealings with unless such entertainment is paid by the employee:
- 8.1.1 In his personal capacity; or
 - 8.1.2 By obtaining reimbursement from the Company as part of the Company's business entertainment expenses.
- 8.2 Employees must not accept, engage or offer any entertainment that is indecent, sexually oriented or that

otherwise might put them in a position of conflict or adversely affect the Company's reputation.

- 8.3 Employees shall not accept and attend luncheon and dinners invitations by suppliers. However, exceptions are made for business meetings or discussions that extended to the normal mealtimes or during site visitations to the suppliers' premises for supplier's audit.
- 8.4 In accepting all such entertainment, the guidelines set out in paragraph 7.0 in respect of acceptance of gifts or favours shall apply.

9.0 FACILITATION PAYMENTS AND KICKBACKS

- 9.1 We do not make and will not accept, facilitation payments or "kickbacks" of any kind.
- 9.2 The use of any legal and recognised fast track process that is publicly available on payment of a fee should not be caught by this legislation.
- 9.3 If an employee is asked to make a payment on the Company's behalf, they should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. The employee should always ask for a receipt which details the reason for the payment.

10.0 DONATION / CONTRIBUTION

- 10.1 The Company should not make contributions to political parties. Employees may, of course, make political donations in a personal capacity but please be sensitive to how such contributions could be perceived, especially by those who are aware of their connection with the Company.
- 10.2 Contributions or donations made by the Company to community projects or charities need to be made in good faith and in compliance with the Company's Code of Conduct and Ethics, this Policy and all relevant policies and procedures. Whilst employees may of course make personal donations to charity, they should not do so on behalf of the Company without prior approval from the Management.

11.0 RECRUITMENT

It is compulsory for all recruitment of new joiners to follow through the recruitment process in accordance with the Company's Recruitment Policy and Procedure.

12.0 RECORD KEEPING

- 12.1 The Company keeps financial records and has appropriate internal controls in place which will evidence the business reason for making payments to third parties.
- 12.2 All employees must ensure all expenses claims relating to hospitality, gifts or entertainment incurred to third parties are submitted in accordance with the Company's claims policy and specifically record the reason for the expenditure.
- 12.3 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties,

such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

13.0 REPORTING POTENTIAL NON-COMPLIANCE ISSUE / PROTECTION

- 13.1 All employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If they are unsure whether a particular act constitutes bribery or corruption, or if they have any other queries, these should be raised with the Head of Human Resources and Administration Department. Any employee or associate with knowledge of suspected malpractices must report his or her suspicion promptly in accordance with the procedure set out in the Company’s Whistleblowing Policy as stated in the Code of Conduct and Ethics.
- 13.2 Associates who report potential misconduct in good faith or who provide information or otherwise assist in any inquiry or investigation of potential malpractice will be protected against retaliation as per Whistleblower Protection Act 2010.

14.0 TRAINING AND COMMUNICATION

- 14.1 Employees must familiarize themselves with this Policy. Acceptance of this policy forms part of the orientation for all new employee. All existing employees will be provided with details of the policy and where deemed necessary by Human Resources and Administration Department, will receive relevant training on how to implement and adhere to this policy as necessary.
- 14.2 The Company’s no tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of any business relationship with them and as appropriate thereafter.


15.0 BREACH OF THIS POLICY

- 15.1 Breaches of this Policy will not be tolerated and may lead to disciplinary and other actions up to and including termination of employment and/or report to the relevant government authorities (if necessary).

16.0 MONITORING AND REVIEW

- 16.1 All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected wrongdoings.
- 16.2 Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption. Any improvements identified will be made as soon as possible.

APPENDIX 1



GIFT DECLARATION FORM

TO BE FILLED BY RECIPIENT

DETAILS OF SENDER	
Name	: _____
Company	: _____
Division / Department	: _____
Designation	: _____
Purpose of Gift	: _____
	: _____
Description of Gift	: _____
	: _____
Estimated Value of Gift	: _____
	: _____
	: _____

DETAILS OF RECIPIENT	
Name	: _____
Company	: _____
Division / Department	: _____
Designation	: _____
Date of receipt	: _____
<input type="checkbox"/> I wish to retain the gift.	
<input type="checkbox"/> The gift is to be retained by the department and distributed accordingly.	
<input type="checkbox"/> The gift was declined.	

* The form is to be returned to our Admin Personnel (Nur Nadzirah: nur.nadzirah@cjcentury.com) upon completion.

Declared by	Acknowledged by (HRA)
Name : Designation : Department :	Name : Designation : Department :