



Anti-Bribery and Anti-Corruption Policy (ABAC Policy)

ANTI-BRIBERY & ANTI-CORRUPTION POLICY (ABAC Policy)

Genting Malaysia Berhad (Company No. 198001004236) (“GENM”) is committed to conduct its business in an ethical and upstanding manner. GENM group of companies and their employees are required to observe and adhere strictly to the following Anti-Bribery & Anti-Corruption Policy:-

(A) General Policy:-

1. GENM and its subsidiaries, related and associate companies (including those subsidiaries in which GENM has a controlling interest) (collectively the “Group”) are committed to observing the laws and regulations which govern the countries in which the Group operates.
2. The Group practices “**ZERO-TOLERANCE**” to acts of bribery and corruption, either directly or indirectly, by persons associated with the Group; including:-
 - 2.1 the Group’s employees (the “Employees”); and
 - 2.2 agents, consultants, representatives, distributors, contractors, suppliers, joint venture partners and any other person(s) associated with the Group (collectively “Business Associates”).

(B) Action by Group

1. To put in place suitable and appropriate channels of communications to ensure that:-
 - 1.1 Employees and Business Associates are given access to report any suspicions acts or incidents of bribery and/or corruption that they may be aware of without fear;
 - 1.2 sensitive information pertaining to incidents and acts of bribery and corruption is handled properly and appropriately.
2. Employees are not at any time penalized for any loss of business to the Group which is a result of (whether directly or indirectly) the Employees’ adherence to the Anti-Bribery & Anti-Corruption Programme (the “ABAC Programme”).

3. The Group shall :

- 3.1 take stern and immediate action against any Employee and/or Business Associate who is proven to be or have been involved in acts of bribery and/or corruption;
- 3.2 avoid having any business transaction with any party who does not accept the principles of the ABAC Programme;
- 3.3 review and improve the ABAC Programme periodically;
- 3.4 not take any adverse action against Employees or Business Associates for bringing to the attention of the Group (in good faith) a known or suspected breach of this ABAC Programme.

(C) Action by Employees

All Employees shall:

- 1. carry out the Group's business dealings and transactions fairly, professionally, ethically, honestly and with integrity.
- 2. report any suspicious, acts or incidents of bribery and/or corruption that they may be aware of.
- 3. not at any time or in any manner, make bribes in order to retain, secure or obtain any commercial, contractual, personal or business advantage.
- 4. not at any time or in any manner, accept bribes or unofficial payments.
- 5. not permit any third party to accept bribes or unofficial payments on his behalf.

(D) Conflict of Interest

- 1. Employees have an obligation to act in the best interest of the Group at all times. Employees are prohibited from using their position or knowledge gained directly or indirectly in the course of their duties and responsibilities or employment for private or personal advantage.

(E) Whistleblower

1. The Group has put in place a Group-wide Whistleblower Policy to uphold the highest standards of professionalism, integrity and ethical behaviour in the conduct of its business and operations. The policy sets out procedures which enables Employees and members of the public to raise genuine concerns regarding actual or suspected unethical, unlawful, illegal, wrongful or other improper conduct and also sets out the process for managing any action, intimidation or harassment against a whistleblower.

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