



Anti-Corruption Policy

1 Purpose

This anti-corruption policy states the Group's commitment to ethical and anti-corruption practices in the course of doing business, and its position and key measures against corruption so as to abide by the regulations in the countries we operate.

2 Scope

Global (Entire Group)

3 Policy Statements

1. The Board adopts zero-tolerance towards corrupt behavior and expects each and every employee to bear in mind and adopt ethical and anti-corruption practices in all business decisions in the course of its business dealings.
2. Employees are to familiarize themselves with the Best World Code of Ethical Conduct, which outlines our values and the way we should act, with integrity to our customers, business partners, employees and stakeholders. Policy reference: BWI-COE-001. Similarly, we appreciate and prefer to work with stakeholders who share a high level of commitment to ethical practices.
3. Employees are prohibited from the solicitation and acceptance of bribes or improper advantages from others in relation to the company's business affairs and offering of bribes or improper advantages to agents of others in carrying out the company's business.
4. Employees are to adhere to the policy and restrictions on acceptance of gifts/advantages and entertainment from persons having business dealings with the company. Policy reference: Gift & Entertainment Policy BWI-GE-001
5. Offering of gifts to persons having business dealings with the company and public servants is only allowed during festive seasons where it is appropriate to send festive gifts, such as mooncakes during mooncake festival in a celebratory or giving spirit.
6. Employees are prohibited from abusing their official position for personal benefits or benefits of personal associates and are required to declare any conflict of interest. Policy reference: Conflict of Interest Policy BWI-COI-001.

7. Employees may report any suspected corruption anonymously via our whistle blowing channel. The identity of the whistle blower will be kept highly confidential and the issue will be acted upon with at the earliest instance if the issue is assessed to be valid. Policy reference: Whistle Blowing Policy BWI-WB-001
8. The anti-corruption policy should be read by all employees and is available in the staff portal and the company's corporate website for reference. Training will be provided periodically to heighten anti-corruption awareness.
9. Employees found to have engaged in prohibited conduct that violate the terms in this policy may face disciplinary action, including termination of employment. Furthermore, employees may be subjected to criminal and civil penalties if they fail to comply with anti-corruption laws in the jurisdictions where they operate in.