

## **ANTI-BRIBERY MANAGEMENT SYSTEM POLICY STATEMENT**

To be the leading player in the rapidly growing water and sewerage sectors within the Asian region, YLI Holdings Berhad and its subsidiaries (“YLI”) are committed to conducting its business dealings with the highest degree of integrity and honesty while ensuring compliance to all applicable laws and regulation.

The Board of Directors and management of YLI have zero tolerance against any bribery and corruption activities and shall pledge to prevent, detect and respond effectively to bribery and corruption through the oversight of YLI’s Anti-Bribery Management System (“ABMS”).

As such, YLI shall:-

- Not give or offer any money, gifts, hospitality or other advantage to any person carrying out a task or business, or to a third party associated with YLI in order to gain an advantage over business dealings.
- Prohibit its employees from accepting or soliciting money, gifts, hospitality and other advantages from existing, potential business associates, or service providers which are intended to influence a business decision or transaction in an improper way.
- Take disciplinary actions against employees who have participated in any form of bribery and corruption activities.
- Forbids retaliatory action against any person who declines to accept or give any bribery as well as individuals who report of an attempted or actual bribery in good faith. The identity of the person shall be treated as confidential and only be revealed on a need-to-know basis or as required by law or court order.
- Perform due diligence checks on all potential employees and business associates prior to or throughout their engagement with YLI.
- Commit to operate its business based on a corruption-free environment and clearly communicate this commitment to all its employees and business associates.
- Maintain an effective anti-bribery and corruption management system and continuously improve on the system by performing regular reviews on the current implementation and practices.

All members and business associates of YLI are expected to read, understand and comply with the requirements illustrated in the ABMS. No compromises will be granted to any parties who have committed or who are found to be involved in acts of bribery and corruption.

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## Definitions

In this Policy, unless specified otherwise -

- “ABAC policy” is the policy that has been developed to define the responsibilities of YLI and its employees in regard to observing and upholding the zero-tolerance approach on anti-bribery and corruption.
- “Anti-Bribery and Corruption” Committee or “ABAC Committee” is the team being established by the BOD to be responsible for all anti-bribery and corruption compliance matters.
- “Audit and Risk Management Committee” or “ARMC” is the committee responsible for monitoring the overall risk management framework, the financial reporting processes, the compliance processes, the performance of auditors and overseeing the audit program.
- “Audit” is an independent, systemised process of examining recorded evidences against an established standard.
- “Authorised personnel” is the personnel being assigned by the BOD to oversee and monitor operational matters in relation to anti-bribery and corruption practices in the Group.
- “Bribery” is defined as the act of giving, agreeing to give, promising or offering to any person any gratification with the intention to obtain, retain or gain an advantage in the conduct of business for the Group.
- “Board” or “BOD” means all independent and non-independent directors, executive and non-executive directors of the Group.
- “Business Associate” refers to an external party with which or with whom YLI has, or intends to establish a business relationship, which includes agents, customers, contractors, sub-contractors, consultants, joint venture partners, service providers, vendors and any associations, bodies or entities formed by law, wherever located.
- “Conflict of Interest” results when a person’s own interests either influence, have the potential to influence, or are perceived to influence decision making which affects YLI.
- “Corruption” is defined as any act of collusion, breach of trust, abuse of power, trading under influence, embezzlement, or fraud.
- “Donation and Sponsorship” means charitable contributions and sponsorship payments made for charitable, communal, educational and social causes and purposes.
- “Employee” is any person who is employed by YLI, either part-time or full-time, including executives, non-executives and any other individuals.

- “Family member” includes spouse(s), children (including stepchildren and adopted children), parents, step-parents, siblings, step-siblings, grandparents, grandchildren, in laws, uncles, aunts, nieces, nephews, and first cousins, as well as any other persons who are members of the household.
- “Gift” is defined as something given voluntarily without payment in return to show appreciation to someone which may include cash, hampers, services and etc.
- “Gratification” is defined as the following -
  - Money, donation, gift, loan, fee, reward, valuable security, property or interest in property, whether movable or immovable, financial benefit, or any other similar advantage;
  - Any office, dignity, employment, contract of employment, service, or an agreement to give employment or render services in any capacity;
  - Any payment, release, discharge or liquidation of any loan, obligation or other liability, whether wholly or in part;
  - Any payment of any kind, discount, commission, rebate, bonus, or percentage;
  - Any demand for cash and in kind or any valuable thing;
  - Any other service or favour including protection from any penalty incurred or from any action or proceedings that are disciplinary, civil or criminal in nature, including the exercise or forbearance of any right, official power, or duty; and
  - Any offer, undertaking or promise, whether conditional or unconditional, of any gratification.
- “Hospitality” is defined as generous reception to/from Business Associates, which may include meals, accommodation, transportation/travel, entertainment and other similar facilities, including leisure or sporting and healthcare activities.
- “Management” comprises of a person or a group of personnel with authority delegated to direct and control YLI’s operations.
- “Monitoring” is the observance of a system, activity or process to determine the stage of progress.
- “Policy” refers to this Anti-Bribery and Corruption policy.
- “Public Officials” are defined as officials of any governments, government agencies or any regulatory, statutory and administrative bodies, whether local or foreign.
- “Third Party” can be defined as an external person or organisation that is associated with YLI.
- “YLI Holdings Berhad” or “YLI” comprises of the public or private companies within YLI Holdings Berhad and/or its subsidiaries.

## A. GENERAL OVERVIEW

### 1. Introduction

In YLI's commitment of a zero-tolerance approach against any and all forms of bribery and corruption, an Anti-Bribery and Corruption policy ("ABAC policy" or "the/this policy") has been developed in cohesion with our Anti-Bribery Management System ("ABMS"). The ABAC policy has been established to provide guidance to employees with a basic introduction on how YLI deals with improper solicitation, bribery, corrupt activities and any other issues that may arise during the execution of business dealings. The ABAC policy shall be read in conjunction with YLI's Code of Conduct ("COC"), and the Malaysian Anti-Corruption Commission Amendment Act (2018) ("MACCA").

A copy of this ABAC policy is also available at [www.yli.com.my](http://www.yli.com.my)

### 2. Anti-Bribery and Corruption Commitment

YLI is fully committed towards conducting its business and operations with integrity, honesty and in compliance with all applicable laws and regulations while avoiding any forms of bribery and corruption under any circumstances and situations.

The Board of Directors ("BOD" or "The Board") and management of YLI are committed to conducting their operation and business dealings with integrity and honesty to prevent, detect and mitigate the risks of unethical practices. The Board and management adopt a "zero-tolerance approach" towards any form of bribery and corruption when conducting its business.

The management shall consistently oversee and monitor bribery and corruption risks, and report all prominent cases to the Board for expedition of adequate resolutions.

### 3. Purpose/ Objective

The ABAC policy sets out the responsibilities of BOD, employees and business associates in complying with and upholding YLI's position against bribery and corruption, as well as providing guidelines and information on dealing with acts of bribery and corruption that might take place during their daily operations. Consequences of non-compliance shall also be addressed in this policy to serve as a greater deterrence to unprincipled conduct amongst BOD, employees and business associates.

### 4. Scope

This ABAC policy is intended to apply to the BOD and employees of YLI. YLI also requires all its business associates and other parties providing goods and services to or on behalf of the YLI in any capacity to comply with all applicable provisions of the policy, in the course of providing goods and services to the YLI.

Business associates refer to third parties that have dealings with YLI such as, sub-contractors, vendors, consultants, agents, representatives, distributors, public bodies, customers and other intermediaries who perform work or services for/ on behalf of YLI.

### 5. References

- Section 17A of the Malaysian Anti-Corruption Commission Act 2009 (MACC Act).
- Code of Conduct ("COC").
- Whistleblowing Policy.
- Terms and Conditions of Employment for Executives including Assistant Managers and Managers of the YLI.

## B. POLICIES

### B1. ANTI-BRIBERY AND CORRUPTION

#### 1. Anti-Bribery Compliance Function

The Board of Directors of YLI are committed to establish an Anti-Bribery and Corruption (“ABAC”) Committee that shall be responsible for all anti-bribery and corruption compliance matters in the future. The roles and responsibilities of the ABAC Committee are as follows:-

- Provide advice and guidance to employees on this policy and issues relating to bribery and corruption;
- Take appropriate steps to ensure that adequate monitoring, measurement, analysis and evaluation of this policy are performed;
- Conduct regular risk assessments to identify the bribery and corruption risks affecting the business, set anti-bribery and corruption objectives, and assess the effectiveness of the controls in achieving those objectives; and
- Report on the performance of this policy to the BOD and management on a regular basis.

Candidates for ABAC Committee shall possess the following qualities:-

- Competency of that personnel, i.e. whether he/she has the appropriate education, training or experience and the ability to perform what is required of her/him;
- Status of the personnel i.e., well-respected individuals where other personnel are likely to heed their opinions; and
- Ability to perform independently, whereby he/she is not personally involved in the activities of the organisation which are exposed to bribery risks, or to the best of their ability, are able to segregate their responsibilities from their compliance responsibilities so as to be impartial.

The ABAC Committee is tasked with responsibility to oversee the anti-corruption compliance programme and to report directly to the BOD.



## 2. Risk Assessment

The management of YLI Group shall be responsible to identify, analyze, assess and prioritize the corruption risks YLI Group and to conduct comprehensive corruption risk assessment in its Yearly Risk Assessments which includes the following:

- a. Opportunities for corruption and fraud activities resulting from weaknesses in YLI Group's governance framework and internal controls systems and procedures;
- b. Financial transactions that may disguise corrupt payments;
- c. Business activities or industries that pose a higher corruption risk;
- d. Non-compliance of external parties acting on behalf of YLI Group regarding legal and regulatory requirements related to anti-corruption;
- e. Relationships with third parties in its supply chain (for example agents, vendors, contractors and suppliers) which are likely to expose YLI Group to corruption risks.

Conduct risk assessment with mitigation plans for the Group.

Report the results of risk assessment to the ARMC.

### 3. Record Keeping

YLI must keep financial records with appropriate internal controls in place to substantiate valid business reasons for making payments to third parties / business associates.

All accounts, invoices, documents and records relating to dealings with third parties / business associates must be prepared and maintained completely and accurately by the management. No accounts are to be kept “off-book” to facilitate or conceal improper payments.

All the relevant policies must be properly maintained and reviewed (or updated) on a regular basis. In addition, all records and discussion pertaining to the ABAC policy must also be properly retained.

Original receipts of donations, sponsorship, corporate hospitality expenses, and register of gifts shall be maintained for at least 7 consecutive financial years.

### 4. Internal Audit

The internal audit for YLI is outsourced to an independent professional firm to provide the Board of Directors (“BOD”) an assurance on the effectiveness of the ABMS in preventing, detecting and mitigating the bribery and corruption risk.

The Group’s internal audit activities are executed in accordance with the annual internal audit plan. All employees shall provide full support and co-operation to the internal auditors at all times.

The internal auditor shall report and present directly to the ARMC on internal audit findings and recommendations for improvement purposes.

## 5. Reporting of Policy Violations

YLI encourages openness and transparency in its commitment to the highest standard of integrity.

Employees who encounter any actual or suspected breach of this ABAC policy are required to report their concerns to the authorised personnel who shall address their concerns in an appropriate manner. It is mandatory for all employees to report to the authorised personnel if they:-

- Are offered a bribe by a third party;
- Are asked to participate in corruption;
- Reasonably believe that the act of bribery or corruption may take place within the Group; or
- Reasonably believe that another employee/third party who is acting for/on behalf of YLI is a victim of bribery.

Any alleged or suspected improper conduct must be disclosed via the portals as delineated under the YLI Whistle Blowing Policy as follows:-

i. Emails:

Chairman of Audit Committee: [corporate@yli.com.my](mailto:corporate@yli.com.my)

ii. Letter: YLI Holdings Berhad

45, Lorong Rahim Kajai 13, Taman Tun Dr Ismail, 60000 Kuala Lumpur, Malaysia.

Attention to: Chairman of Audit Committee

## 6. Communications & Communications Training

YLI shall continuously communicate our commitment to the ABAC policy to all employees on a regular basis.

The communication of the ABAC policy and programmes can be conducted in variety formats and mediums as follows:-

- a) Messages on the Group's website;
- b) Emails and memos;
- c) Code of Conduct; and
- d) Briefing sessions with employees.

### Trainings

YLI is committed to providing adequate trainings in regard to the ABAC policy and relevant laws and regulations to all employees on a regular basis. This is to ensure that all employees are constantly made aware of such requirements and shall, at any given time, understand and comply with the relevant laws and regulations and adherence to the ABAC policy.

All employees of YLI regardless of the grade or position shall attend the anti-bribery and corruption training conducted on a yearly basis.

Training details and participants' attendance shall be taken for recording purposes and shall be maintained for at least 7 years which is in alignment to the record keeping requirements which are to be monitored by the Human Resource ("HR") Department. YLI shall conduct specific trainings to be repeated to any employee which is not categorised under a low bribery risk or whenever deemed necessary.

Furthermore, YLI will ensure all third parties acting for or on behalf of YLI are made aware of the anti-bribery and corruption policies by requiring them to acknowledge on the receipt of YLI policies upon entering into a business relationship with YLI.

## 7. Sanctions of Non-Compliance

### Disciplinary Action and Penalties

Any director or employee who breaches this policy shall be subject to disciplinary proceedings. YLI reserves its right to terminate employment contracts with YLI in the event that such director or employee is found to have violated this policy. Full co-operation shall be provided by YLI to enforcement authorities on any reports lodged against a director, employee, former director, or former employee who is found to have committed an act of bribery.

For business associates, any non-compliance with the ABAC policy shall result in penalties, including termination of contract and blacklisting, without prejudice to the right to initiate legal proceedings against them where YLI's interests, reputation or standing have been affected by the act of breach of the policy by business associates.

### Malaysian Anti-Corruption Commission (Amendment) Act (MACC Act)

Under Section 17A (2) of the MACC Act, the following may be subjected on individuals or organisations found to have committed offences in regard to bribery and corruption:-

1. Imprisonment of up to 20 years;
2. A fine of not less than 10 times the sum or value of gratification which is the subject matter of the offence or RM1,000,000, whichever is higher; or
3. Both the imprisonment and fine may be imposed.

## 8. Continuous Improvements

YLI is committed to continually enhance, improve and strengthen the ABAC policy.

The authorised personnel shall perform assessment on the ABMS at planned intervals to ensure that the policies, procedures, scope and controls are effective in countering bribery and corruption risks faced by the Group.

Employees and business associates are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the authorised personnel.

The ABAC policy shall be reviewed on an annual basis to assure its relevancy and practicability to the Group's business activities. Changes as made to this policy shall be duly communicated and disseminated to all levels of employees to increase their awareness level in preventing acts of bribery and corruption.

## B2. GIFTS

### 1. General

YLI adopts a “No-Gift Policy” whereby all directors and employees shall not solicit or accept any gifts from any business associates that may have direct or indirect business relationships or interests with YLI. Employees, directors (executive and non-executive), family members or agents acting for or on behalf of YLI employees, directors or their family members are prohibited from, directly or indirectly, receiving or providing gifts from or to business associates.

As set out in YLI’s Code of Conduct, a conflict of interest would arise in situation where an individual is in a position to take advantage of his or her role in YLI for personal benefit which includes immediate family members and friends.

YLI’s employees and directors (executive and non-executive) are responsible to inform the business associates on the importance of strict compliance with the Group’s “No Gift Policy”.

YLI prohibits the giving or receiving gift in the form of cash.

### 2. Offering or Giving Gifts

Gifts being offered or given to any third parties by employees, directors (executive and non-executive), family members or agents acting for or on behalf of YLI employees, directors or their family members shall fulfil the following conditions:-

- The gift shall not be used to cause or induce the third party to improperly or illegally influence any business decision;
- The gift shall be given mainly as business courtesy or as a token of appreciation;
- No expectation of any favour or improper advantages from the receiver;
- The gift shall only be given in accordance to the limit of authority of YLI;
- Comply with all the relevant laws and regulations;

Expenses related to the gift shall be properly documented.

### 3. Receiving Gifts

All directors and employees of YLI are prohibited from, either directly or indirectly, accepting gifts, benefits or courtesies provided or offered by business associates or third parties as below:-

- Gifts which are high in value or are considered as luxurious in local business standards;
- Objective of offering the gifts, benefits or courtesies could not be established;
- Act of accepting is against applicable laws and regulations; and
- Gifts that may influence the recipient's role to exercise his/her authority in making a business decision.

In the event that a director or employee is unable to decline/return a gift to the business associates or third parties, they must declare and surrender such gift to the authorised personnel and Managing Director ("MD"). The authorised personnel and MD shall decide the best treatment for the gift as follows:-

- Donate the gift to charity;
- Designate it as a display item;
- Share it with other employees; or
- Permit it to be retained by the employee.

All directors and employees shall record gifts that are received detailing the following:-

- Details of the gift;
- Estimated value of the gift;
- Purpose and occasion such gift was given; and
- Details of the counterparts who provided the gift, including the name of the organisation or entity.



#### 4. Exceptions to Gift Policy

YLI recognises that the exchange of gifts is business etiquette for maintaining good business relationships with business associates and third parties. Although YLI practices a "No-Gift Policy", there are certain circumstances whereby the receiving and provision of gifts are permitted:-

- Exchange of gifts at a company-to-company level (e.g. gifts exchanged between companies as part of an official company visit and thereafter, the said gift is treated as company property);
- Gifts from YLI to external parties in relation to the Group's official functions, events and celebrations (e.g. door gifts offered to all guests attending the event);
- Gifts from YLI to employees, directors and/or their family members in relation to the recognition of an employee's/director's service to the Group;
- Token/gifts of nominal value bearing the Group's logo (e.g. t-shirts, pens, diaries, calendars) that are given out equally to members of the public, customers and key stakeholders during events such as conferences, exhibitions, training, trade shows, etc. and deemed as part of the Group's brand building or promotional activities.

## B3. ENTERTAINMENT & CORPORATE HOSPITALITY

### 1. General

YLI recognises that occasional entertainment and hospitality (including meals and entertainment) are legitimate ways for building good business relationships and are common practices in the business environment. Hospitality and entertainment may include meals, receptions, social or sports events. As such, directors and employees are to exercise proper care and judgment before providing entertainment and hospitality to business associates or to third parties and/or accepting entertainment or hospitality offered by them as undue influence which may give rise to a risk of bribery.

### 2. Providing Entertainment & Corporate Hospitality

Directors and employees of YLI are strictly prohibited from providing or offering entertainment and hospitality with the intention to influence or gain advantage over any business dealings.

When providing or offering entertainment and hospitality to business associates or to third parties for the purpose of maintaining good business relationships, directors and employees shall always exercise proper care and judgment in order to not be perceived as having an influence over any business judgment.

All entertainment and hospitality expenses provided or offered shall be approved by the Head of Department with the purpose of the expenses clearly stated. All expenses shall be properly documented and supported by original receipts or invoices.

### 3. Receiving Entertainment & Corporate Hospitality

YLI strictly prohibits directors and employee from soliciting entertainment and hospitality from business associates or third parties and accepting entertainment that is excessive, inappropriate, or with the potential to influence business decisions. However, if the entertainment and hospitality offered by business associates or third parties is beneficial in maintaining good business relationship with the said parties, directors or employees may pursue after notifying the authorised personnel and recording the details of the events which includes the following:-

- Details of the entertainment or hospitality;
- The value of the entertainment or hospitality;
- The purpose and occasion such entertainment or hospitality were given; and
- The counterparty receiving the entertainment or hospitality which includes the name of the organisation.

In the event that directors and employees are doubtful of the appropriateness of entertainment or hospitality offered by business associates or third parties, they shall seek further advice from the authorised personnel.

### 4. Spouses, Family Member and Partners

YLI prohibits its directors and employees from offering gifts, entertainment or corporate hospitality to a spouse, family members or partner of a business associates or third party.

## B4. DEALING WITH THIRD PARTIES

### 1. General

All business dealings with third parties must be carried out in compliance with all relevant laws and shall be consistent with the values and principles of the YLI. All forms of bribery and corruption will not be tolerated.

### 2. Dealing with Third Parties

Third parties refer to an individual, enterprise, or any form of incorporated legal entity who does not have an employment relationship with YLI but engages in some transactions in YLI's business dealings. Examples of third parties for YLI can be exemplified as follows:-

- Contractors;
- Vendors;
- Potential of existing customer;
- Agents;
- Consultants;
- Joint venture partners;
- Government intermediaries; and
- Public officials.

YLI expects that all third parties acting for or on its behalf are to comply with the relevant laws, regulations and YLI's ABAC policy. As such, prior to the engagement of third parties, a counterparty due diligence shall be conducted to understand the business and background of the potential or prospective counterparties. This is to ensure that the Group is dealing with third parties that have acceptable standards of integrity in the conduct of their business.

To help ensure that YLI only conducts its business with third parties that share their standards of integrity, the following shall be undertaken:-

- Conduct due diligence measures such as background checks on the person or entity, document verification or interviews with the person or entity to be appointed in order to assess the integrity of the person or entity;
- Continuously monitor third party's performance and business practices to ensure ongoing compliance;

- Prohibit any business dealings with a third party who is suspected of engaging in bribery or improper business practices unless those suspicions have been investigated upon and subsequently resolved; and
- Ensure that all third parties are aware of the ABAC policy and shall comply with the requirements of the said policy.

Prior to any engagement with third parties, all third parties are required to acknowledge on a Conflict of Interest Declaration Form which states that:-

- They understand and shall comply with all applicable laws and regulations relating to anti-bribery and corruption;
- They have read, understood and shall comply with the requirements as stipulated in the ABAC policy;
- They have not been convicted nor subjected to any investigation, inquiry or enforcement proceedings by the relevant authorities;
- They shall report any actual or suspected breach as soon as reasonably practicable and to the extent permitted by the law to YLI; and
- They acknowledge that YLI has the right to terminate their contract/ and disqualify them for any violation against the ABAC policy.

In the event that any “red flags” are raised during the due diligence exercise, it shall be investigated and addressed before any formal engagement with the third party. Examples of common “red flags” involving the third parties include:-

- The transaction involves a country known for a high incidence of corrupt payments.
- Family members, businesses or other “special” ties with governments or Public Officials.
- Objection to anti-bribery representations and warranties in agreements/contracts.
- Convoluted payment arrangements such as a payment in cash, payment to third party or request for an upfront payment for expenses or other fees.
- Request for non-disclosure of identity.
- Lack of an office or an established place of business.

- Reference checking reveals a dubious background or suggests that for a certain fee, the third party can resolve the issue.

### 3. Dealing with Public Officials

Public officials are defined as official of any governments, government agencies or any regulatory, statutory or administrative bodies, whether local or foreign. BOD and employees are to ensure that the gift, entertainment or corporate hospitality provided to public officials are not excessive, with the official designation of the public official who is not acting in his personal capacity. The following are examples of prohibited activities during dealings with public officials:-

- Offering gifts, entertainment or corporate hospitality to public officials in making any attempt to influence such person's decision, by directly or indirectly offering or making promises;
- Accepting gifts, entertainment or corporate hospitality from any public officials who might influence or appear to influence business judgements favouring certain individuals or third party;
- Involve in any discussions regarding any business, personal or employment opportunities for personal gain or for the benefit of YLI; and
- Payment for non-business travel and hospitality for any public official or his /her family member / household members without prior approval from the BOD.

## 4. Recruitments

Being an equal opportunity employer, YLI recruits qualified and competent individuals, regardless of their backgrounds. The recruitment of employees is based on approved selection criteria to ensure that only the most qualified and suitable individuals are employed. Proper background checks shall be conducted to ensure that the potential candidate has not been convicted in any bribery or corruption cases domestically or internationally. Detailed background checks shall be performed when recruiting candidates with the responsibility of making decisions on behalf of the organisation.

Offers of employment shall not be given in exchange for a personal benefit, an unfair advantage in any business dealings or as an inducement for future business.

YLI practices fair treatment of its employees of a similar position or seniority in relation to compensations, benefits and promotions.

## B5. FACILITATION PAYMENTS

### 1. General

Facilitation payment refers to a payment made to secure or expedite the performance by a person performing a routine or administrative duty or function of any kind. It may include cash, payments in kind and financial and non-financial advantages with the intention of influencing them in the performance of their duty, function or responsibility.

Employees or directors (executive and non-executive) are reminded that YLI adopts a zero-tolerance on making any sort of facilitation payments, or disciplinary action would be taken against the respective employee which may consequently result in suspension or termination of the employment contract.

### 2. Allowable Facilitation Payment

Nevertheless, there could be instances where payments may be made in exchange for a lawful express or preferential service (such as expedited passport and visa approval process). These payments shall not be considered as facilitation payments provided that the payments fulfil the following criteria:-

- The express or preferential service is available to everyone;
- The payment for express or preferential service is made in accordance with an official and published price list;
- The payment for express or preferential service is not payable to an individual but to the organisation or entity; and
- Official receipt shall be issued by the organisation or entity for the payment of express or preferential service.

### 3. Exception to Making Facilitation Payment

Facilitation payments may be permitted under exceptional circumstances where an employee's safety is at stake and the immediate measure to secure the safety of such employee is to make a facilitation payment. Such facilitation payment must immediately be reported to their superior and the authorised personnel and must be properly documented.



## B6. CORPORATE SOCIAL RESPONSIBILITY, DONATIONS AND SPONSORSHIPS

### 1. General

YLI is committed to the development and wellbeing of the community. As such, YLI shall contribute any assistance in an appropriate manner. However, such requests must be carefully examined for legitimacy and not be made to improperly influence a business outcome.

The proposed recipient of assistance must be a legitimate organisation and in particular, appropriate due diligence shall be conducted to ascertain that the benefits reach the intended beneficiary whilst the programmes meet the intended objectives.

### 2. Allowable Corporate Social Responsibility, Donations and Sponsorships

Generally, all the Corporate Social Responsibility (CSR), sponsorships and donations shall comply with the following process:-

- Perform checking to ensure that the CSR projects or sponsorships were not given to organisation that have any affiliations with a public official;
- Obtaining of all the necessary authorisations and approvals in accordance to the approving limit from BOD and management of YLI prior to the contribution; and
- Ensuring that all expenses are documented in the Group's accounting books and records.

Employees are required to use their own judgment and common sense in assessing the request. Whenever in any doubt as to whether a charitable contribution or social benefit is appropriate, employees shall seek advice from the authorised personnel for further assistance.

## B7. POLITICAL CONTRIBUTIONS

### 1. General

The Group is strictly prohibited from making political donations (to political parties, politicians and political campaigns) for or on behalf of the Group.

Subject to any prevailing laws that govern political contributions, the Group may make a contribution to political parties or candidates. All political contributions require the formal approvals from the BOD and must be accurately reflected in the accounting books and records. The records of all political contributions shall be kept by the authorised personnel.

### 2. Allowable Political Contribution

BOD and employees are allowed to make personal political donations or contributions. However, the donations or contributions must never be associated with YLI and must always be made in employees' and directors' own personal capacity.

## B8. EMPLOYEES, OFFICERS AND DIRECTORS

1. General

All employees, officers and directors shall comply with all relevant laws and shall be consistent with the values and principles of the YLI. All forms of bribery and corruption will not be tolerated.
2. Signing  
Corruption-Free  
Pledge

All employees, officers and directors shall sign a Corruption-free Pledge.
3. Declaration of  
Conflict of  
Interest

All employees, officers and directors shall make a Conflict of Interest Declaration.