

Genting Simon Group
Anti-Bribery and Corruption System Manual
Policy Statement

Genting Simon Group, which established and operating in Indonesia, consisting of PT Nusantara Management Indonesia, PT Pembangunan Property Nusantara and all of its respective Indonesian subsidiaries as may be established from time to time (collectively referred to as the "Company"), is committed to conducting its business professionally, ethically and with the highest standard of integrity. The Company practices a *zero-tolerance approach* against all forms of bribery and corruption and upholds all applicable laws in relation to anti-bribery and corruption.

1. General

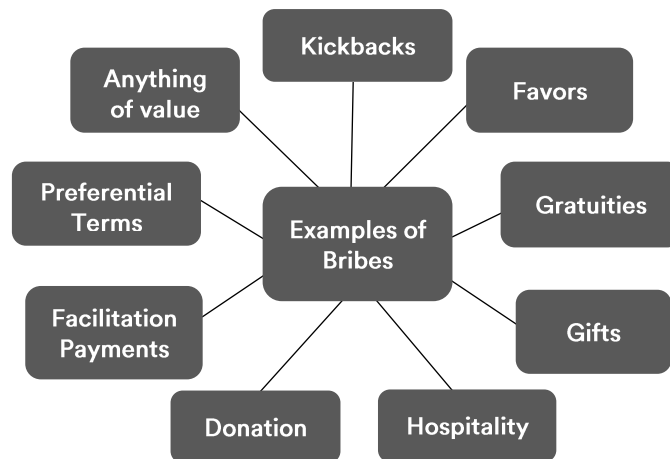
1.1 Overview

In line with its policy against bribery and corruption, the Company has put in place the Anti-Bribery and Corruption System ("ABCS") to consolidate and manage elements, policies, objectives and processes in relation to bribery and corruption risks in the Group.

The Anti-Bribery and Corruption System Manual ("ABCS Manual") aims to set out the main principles, policies and guideline that the Company practices in relation to anti-bribery and corruption. This ABCS Manual is not meant to cover all possible situations that may arise in the course of business. This ABCS Manual is designed to provide a frame of reference and guidance to all persons working for and with the Company in observing and complying with the applicable laws on anti-bribery and corruption.

What is "bribery" and "corruption"?

"*Bribery*" and "*corruption*" refer to the offering, promising, giving, accepting or soliciting of an undue advantage or gratification of any value which can be financial or non-financial, directly or indirectly, and irrespective of location, in violation of applicable law as an inducement or reward for a person acting or refraining from acting in relation to the performance of the person's duties.



1.2 Scope and Application

This ABCS Manual is applicable to:

- (a) all commissionaires, directors and employees of the Company; and
- (b) all commissionaires, directors and employees of subsidiaries of the Company (and with respect to each subsidiary, all references in this ABCS Manual to the Company shall mean the subsidiary), except listed subsidiaries that have their own anti-bribery and corruption systems, in which case such listed subsidiary shall comply with its own anti-bribery and corruption systems, (collectively referred to as "Personnel").

All Personnel are expected to comply with this ABCS Manual and all applicable laws in relation to anti-bribery and corruption.

In the event of a conflict between the contents of the ABCS Manual and any applicable law, the applicable law shall prevail and Personnel and relevant third parties shall comply with applicable law.

2. Who are the ABCS stakeholders?

The Company's ABCS Stakeholders are as follows:

- | | |
|-------------------------------|---|
| (a) Board of Commissionaires; | (j) Business Development Department; |
| (b) Board of Directors; | (k) Legal Department; |
| (c) Senior Management; | (l) Information Technology ("IT") and Shared Services Department; |
| (d) Company Secretary; | (m) Finance Department; |
| (e) Compliance Department; | (n) Human Resources Department; |
| (f) Marketing Department; | (o) Internal Audit Department; |
| (g) Operations Department; | (p) Risk Management Department; and |
| (h) Leasing Department; | (q) Administration Department. |
| (i) Project Department; | |

Note: The Company would be engaging Genting Plantation Berhad's Human Resources Department, Internal Audit Department and Risk Management Department to carry out the functions set out in items (n), (o) and (p) respectively, and Genting Berhad's Company Secretary Department to carry out the functions set out in item (d).

3. Gifts

As a general rule, the Company practices a "No Gift Policy". Save as allowed under this ABCS Manual, all Personnel are prohibited from receiving and/or offering gifts whether directly or indirectly and must immediately refuse and/or return such gifts.

It is the responsibility of employees, directors, and commissionaires to inform external parties involved in any business dealings with the Company that the Company practices a "No Gift Policy" and to request the external party's understanding for and adherence with this policy.

Gifts are only permitted under the following situations:

3.1 Receiving gifts

- (a) Gifts received from Company during internal or official Company events or functions.

Such gift may be retained by the Personnel after declaring to the Compliance Officer.

- (b) Gifts received at official external events or functions

If the value of such gift exceeds Rp1.500.000 (one million and five hundred thousand Rupiah) ("**Gift Threshold**"), the gift received must be approved by the Country General Manager and be declared to the Compliance Officer. Gifts below the Gift Threshold must be declared to the Compliance Officer using the Declaration Form and may be retained by the Personnel after such declaration is made.

- (c) When refusal and/or returning will seriously offend a third party

When refusing and/or returning the gift is likely to seriously offend or severely affect the Company's business relationship with a third party, or when it is against business etiquette or is impractical to refuse and/or return the gifts, firstly the Personnel must approach the situation sensitively by explaining that the Company has strict policies on gift acceptance. Such gift received must be approved by the Country General Manager and be declared to the Compliance Officer, using the Declaration Form. The Country General Manager and Compliance Officer will guide the best way to handle the gift, whether to receive or to return it, such as donating the gift to a relevant charity or returning it with a polite explanation of the Company's policy.

- (d) Token gifts of nominal value bearing company logo
If the value of such gift exceeds the Gift Threshold, the gift must be approved by the Country General Manager and be declared to the Compliance Officer. Gifts below the Gift Threshold must be declared to the Compliance Officer using the Declaration Form and may be retained by the Personnel after such declaration is made.
- (e) Board of Directors approve a gift
In the event that the Board of Directors approves the acceptance of such gift, the Board of Directors and Compliance Officer must then determine the treatment of the gift, whether to:
- Donate the gift to charity; or
 - Hold it as a departmental display; or
 - Share the gift with other employees in the department; or
 - Permit it to be retained by the Personnel.
- In the event that the Board of Directors does not approve the acceptance of such gift, the gift **must** be politely returned with a note explaining the Company's "No Gift Policy".
- (f) Conflict of interest
Where there is a conflict of interest, the gift **must** be politely returned with a note explaining the Company's "No Gift Policy".
- (g) Record
All gifts received **must be recorded** in the Gift Register along with supporting documents kept by the Compliance Officer.

3.2 Offering gifts

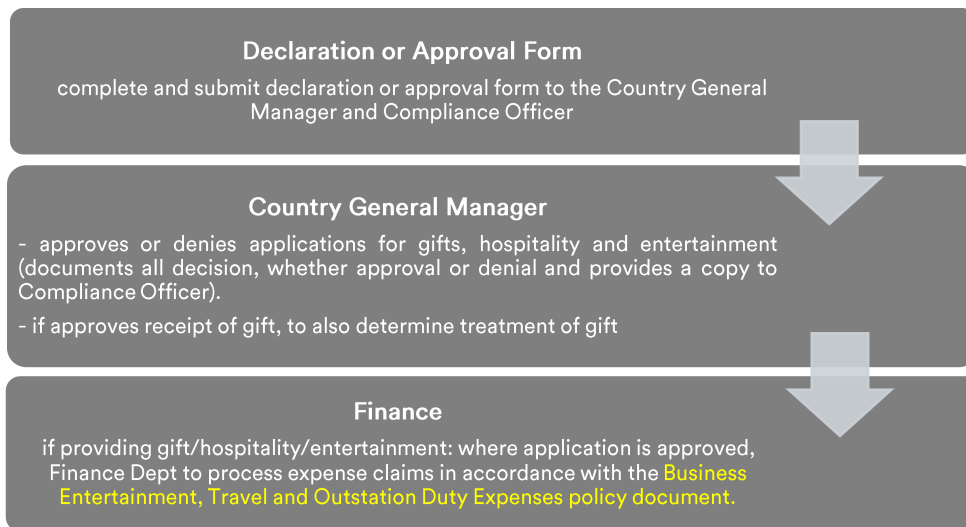
- (a) Permitted gifts
- Gifts offered to third parties during official Company events or functions;
 - Gifts offered to third parties as an exchange of gifts during official external events or functions (gift exchanged is treated as Company property);
 - Token gifts of nominal value usually bearing the Company's logo deemed as part of the Company's brand building or promotional activities;
 - Gifts offered in conjunction with any festive or occasion and in such an event the gift must not exceed the Gift Threshold. If the value of such gift exceeds the Gift Threshold, prior approval must be obtained from the Limits of Authority approval and Country General Manager using the Approval Form and must be declared to the Compliance Officer.
- (b) Exercise proper judgment
All Personnel, the respective Heads of Department, the Compliance Officer and the Country General Manager are expected to exercise proper care and

judgment, taking into account pertinent circumstances and the business context, applicable laws and cultural norms. No gift can be offered or received in return for any business advantage or disguised as a bribe or where it could affect or be perceived to affect the outcome of business transactions and/or are not reasonable or bona fide business expenditures.

(c) Record

All gifts offered **must be recorded** in the Gift Register along with the supporting documents kept by the Compliance Officer.

3.3 Approval process



NOTE:

For the avoidance of doubt, all Personnel are **strictly prohibited** from receiving and/or offering the following, whether directly or indirectly:

- (a) Any gift of cash or cash equivalent, including vouchers, discounts, coupons, shares and commission.
- (b) Any gift involving parties engaged in a tender or competitive bidding exercise.
- (c) Any gift that comes with a direct/indirect suggestion, hint, understanding or implication that some expected or desirable outcome is required in return for the gift.
- (d) Any gift that would be illegal or in breach of applicable laws on bribery and corruption.
- (e) Any gift which is lavish and/or excessive or may adversely tarnish the reputation of the Company.
- (f) Any gift offered or provided to government officials or state administrative officials, particularly if such gift has something to do with his or her position and is against his or her obligation or task.

- (g) Any gift received and/or provided as an expression of gratitude or may influence or appear to influence decision-making or is suspected to affect decisions before and/or during and/or after the process of procurement and/or project.

4. Hospitality and Entertainment

The Company recognizes that it is a common practice to provide modest hospitality and entertainment to build and foster business relationships. However, all hospitality and/or entertainment, if received, in connection with the Company's business, must be unsolicited and must not be perceived as a form of bribery. It must not be accepted if it could affect or be perceived to affect the outcome of business transactions and/or are not reasonable or bona fide business expenditures.

4.1 Providing Hospitality and/or Entertainment

- (a) All hospitality and entertainment provided are limited to business purposes only and must be cleared in accordance with the Company's Limits of Authority.
- (b) The value of all hospitality and/or entertainment provided must not exceed Rp1.500.000 ("H&E Threshold") and in any event must not be more than 3 times a year to the same individual and/or company. Such payments and claims must be approved by the Limits of Authority approval and a copy of such documentation must be provided to the Compliance Officer. Any payment and claims made for any hospitality and/or entertainment exceeding the H&E Threshold or more than 3 times a year to the same individual and/or company must first be approved by the Limits of Authority approval and Country General Manager and a copy of such documentation must be provided to the Compliance Officer.
- (c) Personnel must obtain all necessary approval for issuance of complimentary tickets or passes to corporate hospitality events in accordance with the Company's Limits of Authority and declared to the Country General Manager and a copy of such documentation must be provided to the Compliance Officer.
- (d) Any hospitality and/or entertainment are prohibited for any Public Officials, government officials or state administrative officials regardless of value. When in doubt, please consult first with the Country General Manager and Compliance Officer.
- (e) All claims for hospitality and/or entertainment provided must have supporting documents and where the approval of the Country General Manager is required, a copy of the approval must be attached to the claim and will be processed in accordance with current finance policies for claims. All payments and claims

made for any hospitality or entertainment along with the supporting documents must be recorded and kept.

4.2 Receiving Hospitality and/or Entertainment

- (a) The Company strictly prohibits its Personnel from soliciting hospitality or entertainment or accepting hospitality or entertainment given in response to or in anticipation of a favourable business decision. It must not be received where it may affect or may be perceived to affect the outcome of business transactions and/or are not reasonable and/or bona fide business expenditures.
- (b) All Personnel are required to exercise proper care and judgment before accepting hospitality or entertainment offered or provided by third parties. This is not only to safeguard the Company's reputation, but also to protect the Personnel from allegations of impropriety or undue influence.
- (c) When in doubt, you should either politely decline the offer or seek advice from your Head of Department, the Compliance Officer or the Legal Department.

4.3 Approval process

Please refer to the diagram in paragraph 3.3.

NOTE:

For the avoidance of doubt the Company **strictly prohibits** the giving and receiving of hospitality and/or entertainment in the following situations:

- (a) Any hospitality and/or entertainment provided or received with a view to improperly cause undue influence on any party in exchange for some future benefit or result.
- (b) Any hospitality and/or entertainment provided or received with a direct/indirect suggestion, hint, understanding or implication that some expected or desirable outcome is required.
- (c) Any hospitality and/or entertainment involving parties engaged in a tender or competitive bidding exercise.
- (d) Any hospitality and/or entertainment provided or received that would be illegal or in breach of any applicable laws.
- (e) Any hospitality and/or entertainment that are sexually oriented.
- (f) Any hospitality and/or entertainment provided or received that would be perceived as lavish or excessive or may adversely tarnish the reputation of the Company.
- (g) Any hospitality and/or entertainment offered or provided to government officials or state administrative officials, particularly if such hospitality and/or entertainment has something to do with his or her position and is against his or her obligation or task.

- (h) Any hospitality and/or entertainment received and/or provided as an expression of gratitude or may influence or appear to influence decision-making or is suspected to affect decisions before and/or during and/or after the process of procurement and/or project.

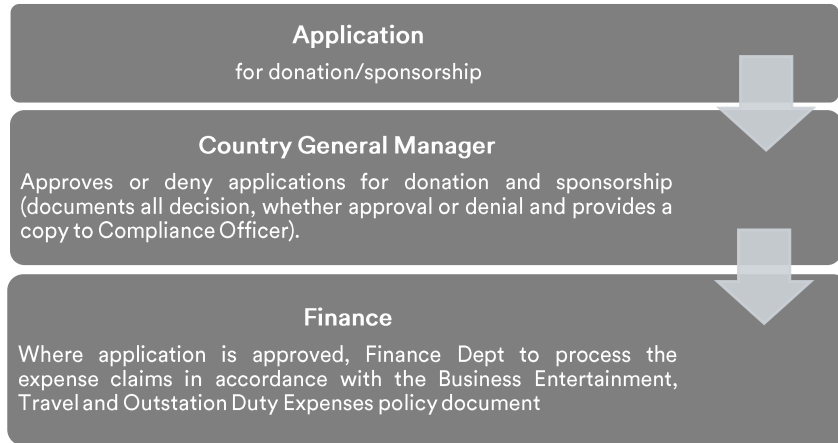
5. Donations and Sponsorships

As a responsible corporate citizen, the Company is committed to contributing to the well-being of the people and the country where it operates. However, the Company recognises that providing donations and sponsorships can pose a bribery risk as it involves payments to a third party without tangible return. As such, all donations and sponsorships are to be made in accordance with the Company's policies.

- 5.1 As part of its commitment to corporate social responsibility, the Company provides such assistance in appropriate circumstances and in an appropriate manner. However, such requests must be carefully examined for legitimacy and not be made to improperly influence a business outcome for the Company.
- 5.2 All sponsorships and donations by the Company must comply with the following principles:
 - (a) ensure such contributions are allowed by applicable laws.
 - (b) obtain all the necessary internal and external authorizations in accordance with the Company's Limits of Authority and approval from the Country General Manager.
 - (c) be made to legal entities (not to individuals) having an adequate organizational structure for proper administration of the funds.
 - (d) be accurately stated in the Company's accounting books and records.
 - (e) not made, directly or indirectly, to a recipient as a way of influencing, reasonably perceived as influencing or obtaining an advantage in business transactions.
 - (f) not made before, during or immediately after contract negotiations; and
 - (g) not to be used as a means to cover up a bribery.
- 5.3 Due diligence must be conducted by the requestor to ensure that the requests are legitimate, and any red flags raised are solved prior to committing the funds.
- 5.4 Any donations or sponsorship or grant to any government institutions, central or any regional governments or state-owned enterprises can only be made after a thorough checking of the laws and/or any policies or guidelines on donations or sponsorship from the relevant government institutions, central or any regional governments or state-owned enterprises. When in doubt, please consult first with the Country General Manager and Compliance Officer.

5.5 Any donations or sponsorship must first be approved by the Limits of Authority approval and the Country General Manager. A copy of such documentation is to be provided to the Compliance Officer.

5.6 Approval process



NOTE:

For the avoidance of doubt, donations and sponsorship are **strictly prohibited** in the following situations:

- (a) Any donation or sponsorship request that comes with a direct/indirect suggestion, hint, understanding or implication that some expected or desirable outcome is required.
- (b) Any donation or sponsorship that is illegal or in breach of any applicable laws.
- (c) Any donation or sponsorship that may otherwise tarnish the reputation of the Company.

6. Political Contribution

As a general rule, the Company does not make political contributions, whether in the form of direct financial support, pledges or through the use of its assets to support any political candidate, incumbent or party. In limited circumstances, the Company may make political contributions in countries where such contributions are permitted by law.

6.1 Political donation refers to any form of direct financial support, pledges or through the use of assets to support any political candidate, incumbent or political party. Where political contribution is permitted, such contribution must be approved by the Board of Directors and:

- (a) must be made to a legitimate political party.
- (b) not made, directly or indirectly, to political parties, organizations or individuals engaged in politics as a way of influencing, reasonably

perceived as influencing or obtaining an advantage in business transactions.

- (c) made in accordance with applicable laws and regulations; and
- (d) not made before, during or immediate after contract negotiations which may be linked to the donation.

6.2 The Company encourages employees to participate in the political election process by voting. Employees may choose to make personal political contributions as appropriate within the limits established by applicable law. Under no circumstances will any employee be compensated or reimbursed in any way by the Company for a personal political contribution. Employees representing the Company are prohibited from associating or representing the company with specific political views or affiliations or support for particular political parties or displaying any bias or favouritism toward specific political views.

7. Facilitation Payment and/or Extortion Payment

The Company *strictly prohibits* accepting or giving, whether directly or indirectly, any facilitation payments or extortion payments in return for any business advantage for the Company.

7.1 What is "facilitation payment"?

"Facilitation payment", often referred to as "*Uang Rokok*" is an illegal or unofficial payment made in return for services which the payer is legally entitled to receive without making such payment.

This usually occurs as a payment to a Public Official or person who has authority to grant certification, licenses, permissions or permits, in order to secure or expedite such process. It is important to note that facilitation payments do not necessarily involve cash or other financial asset, it may be in the form of any advantage with the intention to influence a decision or an outcome.

7.2 What is "extortion payment"?

Extortion is the demanding of a gratification, whether or not coupled with a threat if the demand is refused.

8. Third Parties

8.1 The Company expects all third parties dealing with the Company to share our commitment to zero tolerance against corruption by complying with the ABCS Manual and all applicable anti-corruption laws. All third parties including suppliers, vendors, contractors, tenants, consultants, and service providers performing work or services for or on behalf of the Company will be provided with the Code of Business Conduct

for Third Parties and shall be required to comply with the Code of Business Conduct for Third Parties and all other relevant policies

- 8.2 It is the Company's policy to conduct appropriate and adequate due diligence on all third parties before entering into any formal arrangements.

9. Employees

- 9.1 The Company upholds the principle of workforce diversity, equal opportunity, non-discrimination and fair treatment in all aspects of employment. As such, the recruitment of employees shall be done in accordance with the established standards and procedures.
- 9.2 It is the Company's policy that appropriate and adequate due diligence shall be conducted on all prospective employees. The type of due diligence conducted on prospective employees will be based on the risk profile of the position.
- 9.3 All employment contracts shall incorporate the standard anti-corruption clauses.
- 9.4 Appropriate training on the ABCS shall also be provided upon the commencement of employment.
- 9.5 During the course of employment, all Personnel shall:
- (a) comply with this ABCS Manual, the Code of Conduct and Ethics for Employees, and all other policies/SOP/guidelines in relation to the ABCS.
 - (b) attend annual refresher trainings on the ABCS.
 - (c) declare any actual or potential conflict of interest through the Employee Conflict of Interest Declaration (Please reach out to the HR Department); and
 - (d) sign an Integrity Pledge to confirm their commitment to uphold the Company's anti-bribery policies and comply with anti-corruption laws.

10. Whistleblowing

- 10.1 The Company encourages all its employees, business partners and customers to report any real and/or suspected bribery or corruption.
- 10.2 Anyone who makes a report, complaint or disclosure about any real and/or suspected bribery or corruption is given the protection of confidentiality and will not suffer any detrimental action for making the report. This is provided that the report, complaint or disclosure is made in good faith, belief and without malicious intent.
- 10.3 The Company has established a whistleblowing channel, which is designed to facilitate and allow all Company's Personnels, business partners and customers to report any

real and/or suspected bribery or corruption. The details and procedures can be found in the Whistleblower Policy.

11. Violation and Investigation

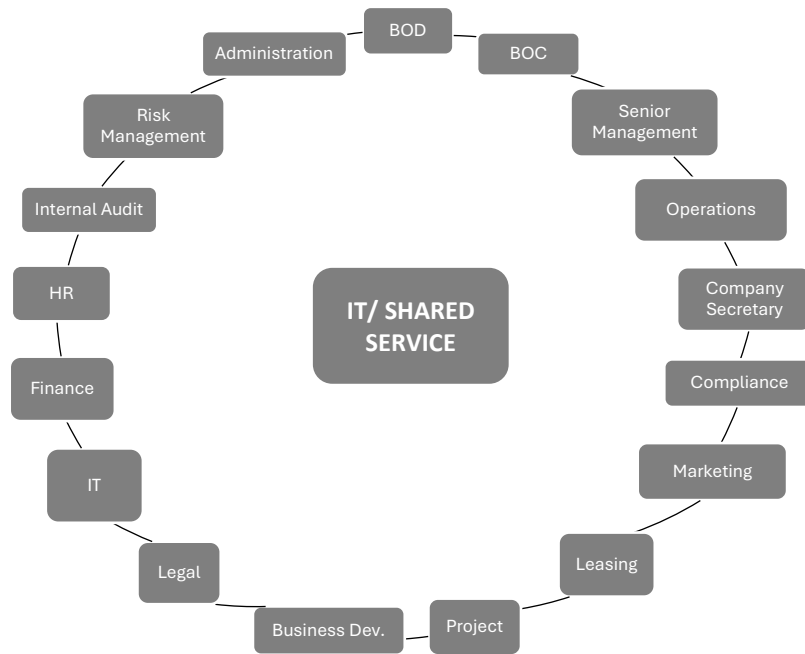
- 11.1 Any conduct which is non-compliant or in violation of this ABCS Manual and/or the ABCS is taken seriously and is subject to disciplinary action (including termination of employment) and criminal prosecution.
- 11.2 Where non-compliance of the ABCS is detected or a complaint is received, the Whistleblower Hotline Committee shall oversee the investigation process. Please refer to the **Whistleblower Policy** for more details.

12. Dawn Raid

- 12.1 All Personnels shall understand and be familiarised with the proper procedures in relation to an unannounced site inspection by the enforcement authorities.
- 12.2 The Dawn Raid Policy sets out the procedures and roles and responsibilities of different stakeholders in the event of a dawn raid.

13. Record Keeping

- 13.1 Record keeping is integral to the ABCS as it serves as evidence that the Company has taken adequate measures and proper procedures in addressing corruption risks and issues.
- 13.2 All ABCS Stakeholders are responsible for keeping proper documentation in their course of complying with the ABCS.
- 13.3 All documentation in relation to the ABCS shall be kept in the manner prescribed by the Compliance Officer and it is the responsibility of all ABCS Stakeholders to ensure that the documentation and records are up-to-date and complete.



14. Monitoring and Review

14.1 Audit

- (a) Internal Audit department of Genting Plantations Berhad oversees and monitors the performance of and compliance with the ABCS. An internal audit review of the ABCS shall be carried out at least once a year to evaluate the ABCS Stakeholders' compliance with the ABCS and to identify areas for improvement.
- (b) The findings of the audit shall be notified and briefed to the Management, followed by an audit report being tabled by the Country General Manager and presented to the Board of Directors.
- (c) A copy of the findings shall also be forwarded to the Compliance Officer for monitoring and further action, if necessary.
- (d) A qualified and independent external auditor shall be engaged once every 3 years to conduct a comprehensive review of the ABCS to assess its effectiveness.



14.2 Risk Assessment

- (a) Risk Management Department of Genting Plantations Berhad oversees and facilitates risk assessment of bribery risks of the Company. A risk assessment in relation to bribery risks shall be conducted on a regular basis.
- (b) All ABCS Stakeholders shall record any bribery risks identified in the respective departments in the risk register.
- (c) A report on the risk assessment shall be tabled and presented by the Country General Manager to the Board of Directors for review.
- (d) In addition to the risk assessments conducted on a regular basis by the respective departments and business units, the Risk Management Department shall carry out a comprehensive risk assessment of the Company's exposure to bribery and corruption risk once every 3 years or when there is a change in law or circumstance of the business.

