

GFM SERVICES BERHAD

ANTI-BRIBERY AND CORRUPTION POLICY

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1. INTRODUCTION

GFM Services Berhad and its subsidiaries (“GFM”) are committed to conducting business dealings with integrity. This means avoiding practices of bribery and corruption of all forms in GFM’s daily operations.

GFM has adopted a zero-tolerance approach against all forms of bribery and corruption and takes a strong stance against such acts.

Compliance to the Anti-Bribery & Corruption Policy (“ABC Policy” or “the Policy”) is mandatory and will be monitored with a principle-based approach.

2. BACKGROUND

The Malaysian Anti-Corruption Commission Act 2009 (“MACC Act” or the “Act”) which came into force on 1 January 2009 was aimed as a catalyst to improve corruption prevention in Malaysia. In 2018, MACC (Amendment) Act 2018 have been 2rganiz and the principle of commercial 2rganization’s criminal liability (corporate liability) was introduced in Section 17A of the Act. The Malaysian Anti-Corruption Commission has stated that the corporate liability provision of the MACC Act will be in force as of 1 June 2020.

Maintaining a workplace culture with strong ethics and integrity is part of a competent governance framework and is fundamental to good 2rganizational performance toward creating a business environment that is fair, transparent and free from bribery and corruption. These principles of governance are embedded in GFM core values.

Pursuant to Guidelines on Adequate Procedures issued by the Government, the GFM ABC Policy has been designed to provide company with a framework to establish the necessary measures to prevent the occurrence of corrupt practices in relation to our business activities. GFM encourages the use of GFM’s whistleblowing channel to raise concerns in relation to real or suspected corruption incidents (please refer to GFM Whistleblowing Policy).

The GFM ABC Policy is linked to other Company policies, guidelines and procedures and it seeks to ensure that GFM’s employees, businesses and anyone acting for and on behalf of GFM comply with applicable laws and the provisions of this Policy.

This Policy shall be read in conjunction with:

1. BPM 1.1 Business Ethics
2. BPM 12.1.1 Tender Guidelines
3. BPM 16.1 Whistle-blower Policy
4. BPM 21.1 Code of Ethics
5. BPM 22.1 Code of Conduct
6. BPM 23.1 Gifts and Hospitality Policy and Guidelines
7. BPM 24.1 Investor Relations and Communications Policy
8. GFM’s Employee Booklet

3. SCOPE

GFM ABC Policy is applicable to every Personnel, any agent, person or entity engaged under a contract forservice or engaged by GFM for any business-related activity formally and informally.

4. DEFINITIONS

The following definitions are included in this policy.

4.1 Bribery

Bribery is defined as any action which would be considered as an offence of giving or receiving 'gratification' under MACCA.

In practice, this means offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person a position of trust within an organisation.

'Gratification' is defined in the MACCA to mean the following:

- (a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
- (b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- (c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- (d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- (e) any forbearance to demand any money or money's worth or valuable thing;
- (f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
- (g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).

Bribery may be 'outbound', where someone acting on behalf of GFM attempts to influence the actions of someone external, such as a Government official or client decision-maker.

It may also be 'inbound', where an external party is attempting to influence someone within GFM such as a decision-maker or someone with access to confidential information.

Bribery and corruption are closely related. However, corruption has a wider remit. See 'Corruption' definition below.

4.2 Business Associate

An external party with whom the organisation has, or plans to establish, some form of business relationship. This primarily include clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors.

4.3 Corruption

The Transparency International definition of corruption is 'the abuse of entrusted power for personal gain.

For the purpose of this policy, corruption, is defined primarily as any action which would be considered as an offence of giving or receiving 'gratification' under the Malaysian Anti-Corruption Commission Act 2009 (MACCA) ('Bribery' as defined above).

In addition, corruption may also include acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.

4.4 Conflict of interest

When a person's own interests either influence, have the potential to influence, or are perceived to influence their decision making of GFM.

4.5 Donations and Sponsorship

Charitable contributions and sponsorship payment made to support the community.

4.6 Directors

Directors include all independent and non-independent directors, executive and non-executive directors of GFM and shall also include alternate or substitute directors.

4.7 GMD means Group Managing Director of GFM.

4.8 Employee

All individuals directly contracted to GFM on an employment basis, including permanent and temporary Employees and Directors.

4.9 Exposed Position

A staff position identified as vulnerable to bribery through a risk assessment. Such positions may include but is not limited to any role involving procurement or contract management; financial approvals; human resource; relations with government officials or government departments; sales; positions where negotiation with an external party is required; or other positions which GFM has identified as vulnerable to bribery.

4.10 Facilitation payment and Kickbacks

A payment or other provision made personally to an individual in control of a process or decision. It is given to secure or expedite a routine or administrative duty or function. Kickbacks are typically payments made in return for a business favour or advantage and can include discounts or other types of cash incentives.

4.11 GFM means GFM Services Berhad and its group of companies.

4.12 Corporate Gift

Something given from one organisation to another, with the appointed representatives of each organisation giving and accepting the gift. Corporate gifts may also be promotional items given out equally to the general public at events, trade shows and exhibitions as a part of building GFM's brand.

The gifts are given transparently and openly, with the implicit or explicit approval of all parties involved. Corporate gifts normally bear GFM name and logo and are of nominal value. Examples of corporate gifts include items such as diaries, table calendars, pens, notepads, plaques, and festive gifts such as hampers, oranges and dates.

4.13 Personal Gift

Something given from one individual to another, with the intention of creating or enhancing a personal relationship. The gifts are given in a private setting, without the knowledge or approval of GFM management of one or both parties.

Personal gifts may include cash, cash equivalents such as credit cards, bitcoin or savings accounts, electronic items, watches, luxury pens, property, vehicles, free fares, shares, interest free loans, lottery tickets, travel facilities, entertainment, services, club memberships, any forms of discount or commission, jewellery, decorations, souvenirs, vouchers or any other valuable items.

4.14 Hospitality

Hospitality means the considerate care of guests, which may include refreshments, accommodation and entertainment at a restaurant, hotel, club, resort, convention, concert, sporting event or other venue such as Company offices, with or without the personal presence of the host.

Provision of travel may also be included, as may other services such as provision of guides, attendants and escorts; use of facilities such as a spa, golf course or ski resort with equipment included.

4.15 MACCA define as Malaysian Anti-Corruption Commission Act 2009

5. **ANTI-BRIBERY CORRUPTION POLICY**

GFM is committed to conduct business in an honest and ethical manner in full compliance with all applicable laws and regulations in every jurisdiction that GFM operates. GFM is committed to act professionally, fairly and with integrity in all our business dealings and relationships by implementing and enforcing effective systems to counter bribery.

GFM takes a zero-tolerance approach to bribery and corruption where all detected violations will be investigated and appropriate actions will be taken against those found responsible. GFM strives to develop, document, implement and continuously improve a functioning anti-bribery management system as an indispensable tool to prevent violations and boost GFM performance.

Every employee and vendors of GFM including any agent, person or entity engaged under a contract for service or engaged by GFM for any business-related activity formally and informally should maintain the values of integrity, honesty and professionalism at the highest level at all times during his/her employment or engagement under GFM or when representing GFM in business transactions with third parties.

It is the responsibility of all employees and vendors is to report all incidents of corruption or any other integrity violations to the Internal Audit Unit (IAU) or via the established Whistleblowing platforms. Disclosures from anonymous sources are also encouraged. All reports shall be treated with the strictest confidentiality and shall not be disclosed or discussed with parties other than those who are involved with the investigation.

In essence, GFM is fully committed to:

- Adopting a zero-tolerance approach to any form of corruption.
- Creating human capital with high ethical value and integrity.
- Acting in a fair, ethical and honest manner with all our employees and business associates.
- Upholding all applicable laws where GFM operates.

This Anti-Bribery and Anti-Corruption Policy Statement is complementary to and is to be read together with the following:

- GFM Anti-Bribery and Anti-Corruption Policy and Framework.
- GFM Whistleblowing Policy.
- MACC Act 2009 and MACC (Amendment) Act 2018.
- All other relevant GFM policies, frameworks, procedures, standards, rules and regulations.

Any person who commits an act of bribery, knows or fails to report an act of giving and offering of bribery is committing an offence under MACC Act 2009 and the MACC (Amendment) Act 2018. Upon conviction, the person shall be liable to a fine or imprisonment or both as stipulated under the Act.

This Anti-Bribery and Anti-Corruption Policy Statement demonstrates GFM's commitment towards having a strong culture of high ethical practice among its Personnel and embedding core values.

General guidelines associated to this Policy:

5.1 Zero-tolerance: GFM upholds a zero-tolerance approach, therefore, all forms of bribery and corruption is prohibited.

In addition to bribery, Employees must not participate in any corrupt activity, such as extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.

5.2 Forms of Bribery: Bribery may take the form exchange of money, goods, services, property, privilege, employment position or preferential treatment.

Employees shall not therefore, whether directly or indirectly, offer, give, receive or solicit any item of value, in the attempt to illicitly influence the decisions or actions of a person in a position of trust within an organisation, either for the intended benefit GFM or the persons involved in the transaction.

5.3 Integrity First: GFM recognises the value of integrity in its Employees and Directors.

GFM's recruitment, training, performance evaluation, remuneration, recognition and promotion for all Employees, shall be designed to recognise integrity.

GFM shall conduct due diligence on Employees who holds or may be holding, Exposed Positions.

No Employee will suffer demotion, penalty or other adverse consequences for refusing to pay or receive bribes or other illicit behaviour, even if such refusal may result in GFM losing business or experiencing a delay in business operations.

5.4 Merit-Based: GFM's awards contracts and employment purely based on merits.

Usage of support letters in any form shall not be recognised as part of the business decision making process.

5.5 Compliance to laws and regulations: All Employees of the GFM and its associates are responsible in ensuring that they always comply with all laws and regulations, in particular, to the Malaysian Anti-Corruption Commission Act 2009.

No excuses or exceptions will be acceptable for non-compliance of any domiciled laws and regulations where the GFM conducts its businesses.

6. GFM ANTI-BRIBERY AND CORRUPTION FRAMEWORK

6.1 GFM's Anti-Bribery and Anti-Corruption Framework is based on The Guidelines on Adequate Procedures ("GAP") issued by the Prime Minister's Department. There are five (5) Guiding Principles under the gap which are as follows:

1. Top Level Commitment;
2. Risk Assessment;
3. Undertake Control Measures;
4. Systematic Review, Monitoring and Enforcement; and
5. Training and Communication.

Figure 1 below provides an overview of GFM's anti-bribery and corruption framework.



Figure 1

6.2 Leadership and Governance

6.2.1 Oversight – Governing Body

Risk Management & Compliance (RM&C) is responsible for establishing, governing, maintaining and reviewing the contents and operation of the GFM ABC Policy. RM&C shall exercise discretion and reasonable oversight with respect to the adequacy, communication, effectiveness and implementation of the GFM ABC Policy.

6.2.2 Accountability and management commitment – Top Management

The Top Management is accountable towards the implementation of the GFM ABC Policy. In this respect, the Top Management’s responsibilities include the following:

- a) Implementing the GFM ABC Policy to all level of organisation within GFM and set the right “tone at the top.”
- b) Deploying adequate resources and assigned to person(s) who have the appropriate competence towards the effective implementation and operation of the GFM ABC Policy.
- c) Review the anti-bribery and anti-corruption implementation program and propose for improvement as and when necessary.
- d) Putting in place the appropriate controls and contingency measures which are reasonable and proportionate, in order to address risks and issues on bribery and corruption.
- e) Providing anti-bribery and anti-corruption awareness training to its employees and communicate the program.
- f) Ensuring overall oversight and assurance on compliance with the GFM ABC Policy.

6.2.3 Communication

The GFM ABC Policy shall be made available to all Personnel within GFM. For the third party, GFM will publish its stand and commitment on anti-bribery and anti-corruption throughout the relevant Company’s communication channel.

6.2.4 Integrity and ethics enforcement

6.2.4.1 GFM’s Compliance Unit (“CU”)

CU is the custodian of the GFM ABC Policy and shall take the reasonable and proportionate measures to ensure the implementation of the GFM ABC Policy and programs throughout GFM.

CU core functions under the GFM ABC Policy are:

- a. Integrity Strengthening
 - i. Plan, implement, and coordinate integrity strengthening programs to enhance the practice of integrity in the organisation.
 - ii. Providing advice, guidance and communicate to Personnel on the GFM ABC Policy and issues relating to bribery and corruption.
 - iii. Providing adequate and appropriate anti-bribery and anti-corruption training and awareness to Personnel.
 - iv. Reporting on the performance of the GFM ABC Policy to the Governing Body and Top Management on yearly and/or ad hoc basis.

- b. Governance
 - i. Update the GFM ABC Policy to reflect relevant new changes as and when necessary.
 - ii. Conduct checks and research on policies, systems, and work procedures and to suggest improvements.
 - iii. Coordinate the improvement of the organisation's relevant procedures and systems.

6.2.4.2 Human Resources Department (HRD)

HRD is the custodian of the GFM's Whistleblowing Policy and shall manage the overall system, process, and implementation of the GFM's Whistleblowing Policy. GFM shall utilise the whistleblowing channel under the GFM's Whistleblowing Policy.

HRD core functions under the GFM ABC Policy are:

- a. Complaints Management
 - i. Supervise, monitor, and manage the receiving of information/complaints through the whistleblowing channel on improper conducts, bribery and corruption related to GFM in an appropriate and timely manner.
 - ii. Ensure action is taken on information/complaint on bribery and corruption.
- b. Detection and Verification
 - i. Detecting and verifying information/complaints related to on improper conducts, bribery and corruption in GFM.
 - ii. Facilitate due and fair investigation process, any person who discovers or suspects any improper conduct within GFM.
 - iii. If necessary, the Chief Integrity Officer will inform the Whistleblower on the action taken against the report and the investigation result.

6.3 Internal Culture

6.3.1 Policies and framework

The purpose of the policies and framework is to provide a foundation to support the culture of good corporate governance and integrity throughout GFM. This includes but not to limited to:

- a. **GFM's Board and Committees Terms of Reference** set out the Board and Committees' strategic intent and outline the Board and Committees' role and functions, composition, operation and processes.
- b. **GFM Business Ethics** outlines GFM's commitment to appropriate and ethical practices. It sets out the principles, practices and standards of personal and corporate behaviour. All Personnel are required to comply with the COBE. Failure to comply with the Business Ethics is a serious breach, and appropriate action will be taken for its non-compliance.
- c. **GFM Whistleblowing Policy** provides an avenue for all Personnel and third parties to make good-faith disclosure and report instances of unethical, unlawful or undesirable conduct without fear of reprisal. The identity of the Whistleblower and the concerns raised are treated with utmost confidentiality.

6.3.2 Employee awareness and training

The GFM ABC Policy aims to safeguard GFM core values by informing employees of the obligations, duties and commitments within their roles, the risks of corruption in their work and any changing circumstances which may be relevant to the employees. The awareness and training programmes shall be periodically updated as and when necessary to reflect relevant new information.

6.3.3 Ethical standards and compliance

Every Personnel within GFM is expected to understand and comply with the relevant company policies and standards. Every Personnel are responsible to ensure that their personal and business conduct demonstrates honesty, integrity, leadership, professionalism, loyalty, responsibility and trustworthiness towards fellow employees, customers, business partners, authorities and the public.

6.4 Operational Strategies

6.4.1 Corruption Risk Management (“CRM”).

1. Bribery and corruption risks identification and assessment are an integral part of this Policy. The CRM shall be conducted by Risk Management Unit (RMU). CRM process helps GFM to identify structural weakness that may facilitate bribery or corruption and provide a framework for all staff to take part in identifying risk factors and treatments and embeds bribery and corruption prevention.
2. GFM should conduct bribery and corruption risk assessments annually and when there is a change in law or circumstance of the business to identify, analyse, assess and prioritise the internal and external corruption risks of GFM.
3. The risk assessment for bribery and corruption shall be incorporated into the existing Enterprise Risk Management processes.
4. The Group Managing Director / Chief Executive Officer shall be responsible to oversee the day-to- day corruption risk management identified by RMU.
5. RMU shall report the risks to both the Audit Risk Management Committee and Board of Directors on quarterly basis. The Group Managing Director / Chief Executive Officer shall also responsible to ensure that risks are reported to the Board of Directors.
6. The Board of Directors then noted the reports so that they are aware of bribery and corruption risks within GFM and ensure that appropriate actions are taken by the Top Management to mitigate the risks.
7. Internal Audit Reviews, which are undertaken according to Annual Internal Audit Plan, provides independent assurance on the adequacy, existence and effectiveness of the governance, risk management and control processes.

6.4.2 Prevention

Preventive measures shall be taken with the aim to identify and resolve weaknesses in practices, systems and work procedures and continue to increase the level of efficiency by eliminating opportunities for bribery and corruption or in kind.

6.5 Management Environment

6.5.1 Detection and disclosure of improper conduct, response, and report

- a) GFM shall not tolerate any improper conduct by any employee, any agent, person or entity engaged under a contract for service or engaged by GFM which can lead to any act of corruption as outlined to the Policy herein and/or under any applicable laws.
- b) An Improper Conduct includes committing any act of corruption as outlined to the Policy herein and/or under any applicable laws.
- c) The success of GFM's anti-bribery and anti-corruption measures depends on all Personnel, including any person or entity engaged by GFM, adhering to the GFM's ABC Policy & Framework. In this respect, all relevant parties are under an obligation to report or disclose any Improper Conduct, including acts of corruption, in accordance with the procedures set out in the Policy to enable GFM to take prompt action to investigate the reports and take further actions.
- d) GFM shall provide a transparent and secure disclosure process upon discovery of any Improper Conduct to ensure anonymity of the Whistleblower without compromising the confidentiality of the report or security of the Whistleblower.
- e) Any improper conduct that is discovered or genuinely suspected by the Whistleblower may be reported through the following channels in the whistleblowing policy.
- f) Any Personnel who knows and fails to report an act of giving and offering of bribes or any other acts of corruption is liable to a misconduct under this Policy and risks committing an offence under the MACC Act. If the person is convicted under the Act, he/she is liable to the penalties stipulated under the MACC Act 2009.
- g) GFM shall not penalise or hold any Personnel accountable for refusing to accept any even if the refusal results in GFM suffering financial or non-financial losses.

6.6 Review & Improvement

The Top Management should ensure that regular reviews are conducted to assess the performance, efficiency and effectiveness of the anti-bribery and anti-corruption programme, and ensure the programme is enforced. The reviews should form the basis of any efforts to improve the existing anti-bribery and anti-corruption controls in place in GFM. GFM may also consider to appoint an external auditor at least once every three (3) years to obtain assurance that the organization is operating in compliance with its policies and procedures in relation to anti-corruption.

7. VIOLATION OF THE ABC POLICY

- 7.1 Any violation of the ABC Policy by Employees of the GFM will attract serious repercussions and disciplinary action after due inquiry.
- 7.2 Employees who are found to have assisted or facilitated the violation of the ABC Policy, whether actively or by way of negligence or omission, will also be deemed to have violated the ABC Policy and committed a misconduct.
- 7.3 Actions by GFM may include:
 - a) Dismissal
 - b) Legal action by GFM
 - c) GFM filing a police report
 - d) GFM filing a report to MACC

8. GIFTS, HOSPITALITY AND ENTERTAINMENT

Please refer to GFM's Gifts and Hospitality Policy and Guidelines (BPM 23.1)

9. REPORTING FOR VIOLATIONS OF POLICY & WHISTLEBLOWER RIGHTS

Please refer to GFM's Whistle-Blower Policy (BPM 16.1)

10. FACILITATION PAYMENTS AND KICKBACKS

10.1 GFM does not make facilitation payments or "kickbacks" of any kind.

10.2 Facilitation payments are typically small, unofficial payments made to secure or expedite a routine business transaction by a counter party agent, employee or official (such as the issuance of work orders, approval of inspections, expediting payments etc.).

10.3 Kickbacks are typically payments made in return for a business favour or advantage and can include discounts or other types of cash incentives.

10.4 As guidance, any suspicions, concerns or queries regarding a payment should be raised with the immediate superior or head of department.

11. PUBLIC OFFICIALS & GOVERNMENT DEALINGS

11.1 When dealing with public officials, Employees of GFM should ensure that any giving or receiving of gifts do not relate to, in any form whatsoever, the public official's official dealings or public duty.

11.2 Any hospitality of public officials, subject to the approval of GGMD, are for circumstances where it is to reasonably facilitate genuine promotional, business or educational meetings.

11.3 Any hospitality provided must be without expectation of any influence exerted on the public official in exchange for any commercial outcome, and should always be at a reasonable and modest value.

12. DONATIONS, SPONSORSHIPS & CHARITABLE CONTRIBUTIONS

12.1 Any donations, sponsorships and charitable contributions by GFM must be done with the approval of the GMD and it must be done in a transparent manner for social and moral responsibility.

12.2 Donations should never be paid in exchange for any business implications (e.g. obtain a business, or to obtain some form of advantage) to GFM.

12.3 Donations made in a private capacity of an Employee should never be in exchange for any improper purposes that affects the business of the GFM.

13. POLITICAL DONATIONS

Political donation is prohibited.

14. TENDER PROCESS

Please refer to GFM's Tender Guidelines (BPM 12.1.1)

15. BUSINESS ASSOCIATES, THIRD PARTIES & AGENCIES

15.1 This section covers, but not limited, to the following:

- a) agents
- b) consultants/advisors
- c) contractors/subcontractors
- d) business contacts
- e) professional advisor
- f) joint venture partners
- g) vendors/parties supplying goods and services

15.2 These parties are to made aware of GFM's ABC Policy, that shall be posted at GFM's website.

15.3 Compliance to GFM's ABC Policy shall be made compulsory to these parties, as part of their acceptance to deal, be associated or wishing to represent GFM.

GFM is to highlight the need to comply with its ABC Policy when engaging with these parties.

A clause to stipulate this shall be incorporated in all of GFM's agreement or service/supply contract with these parties.

15.4 GFM shall include standard clauses in all contracts with these parties, enabling GFM to terminate the contract in the event that bribery or an act of corruption has been proven to occur.

15.5 Where reimbursements or payments are to be paid to these parties:

- a) the Employee submitting and recommending the reimbursement or payment shall be the first line of defence
- b) the Employee approving the reimbursement or payment shall be the second line of defence
- c) the Employee processing the reimbursement or payment shall be the third line of defence

in ensuring that such reimbursement or payment made are for a proper transaction and not for reimbursements that can be tied to giving any form of gratification for improper purposes.

16. CONFLICTS OF INTEREST

Please refer to GFM's Employee Handbook - Code of Conduct

17. RECRUITMENT, PROMOTION AND SUPPORT OF EMPLOYEEES

17.1 GFM's recruitment, training, performance evaluation, remuneration, recognition and promotion for all GFM Employees, including management, shall be designed and regularly updated to recognize integrity.

17.2 A Nomination and Remuneration Committee ("NRC") was formed by GFM's Board of Directors to oversee this. In addition, Policies and Procedures on this matter is documented in GFM's Employee Handbook.

18. DECLARATION, COMPLIANCE AND REVIEW OF THE POLICY

18.1 All Employees shall declare in writing that they have read, understood and will abide by this Policy.

A copy of this declaration shall be documented and retained by the Culture and Talent Department.

Sample Declaration Form can be found in the Appendix of this Policy.

18.2 Where there is any uncertainty for any practices which relate to the ABC Policy, Employees must seek the advice of their supervisor or Head of Department. Where there is still uncertainty, they should direct their concerns to the Corporate Governance Department, Culture and Talent Department or Legal Department.

18.3 The ABC Policy will be reviewed at least once every three years to ensure that it continues to remain relevant, appropriate and effective.

End of Policy