

**CENTURION CORPORATION LIMITED**  
(Incorporated in Singapore)  
(Co. Reg. No: 198401088W)

**ANTI-CORRUPTION POLICY**

**INTRODUCTION**

Our Group is committed to maintaining the best employment practices and the highest standards of openness, probity, accountability, integrity, corporate governance and to confidentially act with honesty at all times. To enable this, our Group is adopting an anti-corruption policy to provide guidance our employees in offering and accepting business courtesies with vendors and customers,

Our Group adopts a zero-tolerance policy towards any forms of corruption and bribery in our business. Our employees have to observe the anti-bribery and anti-corruption legislations and regulations in the countries where we have business activities in and undertake not to engage in any corrupt or improper practices.

**Policy on Accepting and Offering Business Courtesies**

Our Company does not allow our employees to solicit or accept any benefits and business courtesies such as commissions, gifts in cash or kind, gifts that are more than nominal value of **S\$100**, or any other service, favour or advantage of any description whatsoever, from any organisation, firm or individual with whom they deal with in the course of the employment.

Our Company does not allow our employees to promise or offer to give any benefits and business courtesies such as commissions, gifts in cash or kind, gifts that are more than nominal value except for entertainment meals whose limit is stated in the local country entertainment policy., or any other service, favour or advantage of any description whatsoever, to any individual of external parties with whom they deal with in the course of the employment.

Business Courtesy means anything of value, a favor, or a benefit provided free of charge or at a charge less than fair market value. A business courtesy may be a tangible or intangible benefit, including, but not limited to, such items as non-monetary gifts, meals, drinks, entertainment, hospitality, services, recreation, door prizes, transportation, discounts, tickets, passes, sporting events, side excursions or outings etc.

If there are any doubt or uncertainty, employees should declare and seek prior clearance or confirmation from HR.



## Entertainment Limits for Business Meals

The following entertainment expense limits is extracted from the Singapore entertainment policy and apply for business meals (including taxes and gratuity). In the event that the amount differs between this policy and the entertainment policy, the limits in the entertainment policy would prevail.

Entertainment Meal	For Prospect/ Customer/Business Partner per person	For Vendor/Employee per person
Breakfast	S\$ 40	S\$30
Lunch	S\$100	S\$60
Dinner	S\$180	S\$100

The entertainment expense limit is based on the intended purpose and the business associate's profile. For more details, you may refer to the local entertainment policy.

In pursuance of the Anti-Corruption Policy, our Group has set below guiding principles on accepting and offering of business courtesies and guiding principles in dealing with vendors and suppliers.

Activities	Guiding Principles
Offering of business courtesies	<p>Ensure necessary and justifiable for the occasion</p> <p>Ensure appropriateness to local business customs and culture</p> <p>Ensure reasonable monetary value or frequency</p> <p>Do not cause embarrassment or adversely affect reputation of either party</p> <p>Do not offer business courtesies above nominal amount or the amount stated for entertainment meal.</p> <p>Would not be viewed as sexual harassment, or discriminatory</p> <p>Do not contravene applicable laws and regulations</p>
Receiving of business courtesies	<p>Ensure appropriateness to accept</p> <p>Ensure no undue influence on business dealings</p> <p>Ensure no conflict of interest</p> <p>Business courtesies such as meals and refreshment is unsolicited</p> <p>Declare business courtesies received above nominal amount of <b>S\$100</b></p> <p>Do not accept frequent business courtesies from the same party</p> <p>Do not cause embarrassment or adversely affect reputation of either party</p> <p>Do not contravene applicable laws and regulations</p>
Managing Business Relationships	<p>Act with integrity and professionalism</p> <p>Make decisions/representation only when duly authorised</p> <p>Exercise discretion over frequency and place of business activities</p> <p>Maintain security and confidentiality of data and information used in business interactions</p> <p>Do not manipulate business relationship for personal gains and interests</p> <p>Do not offer nor provide kickbacks or bribes or favors</p> <p>Do not ask for or accept kickbacks or bribes or</p> <p>Do not contravene applicable laws and regulations</p>

In the events that an employee of our Group received an inappropriate business courtesy where it cannot be returned immediately, such as a gift, and/or the circumstances make it inappropriate to decline, it must be reported immediately to Human Resources using the "Declaration form for business courtesies and gift" in Appendix A and the business courtesy, if tangible, should be surrendered to HR.

#### **Offering of business courtesies above nominal amount or limit**

There could be circumstances where the company may have to offer business courtesies that are above the nominal amount or limit due to various circumstances such as location of the city, the counterparty/business associate receiving the business courtesies etc.

The employee will need to seek written approval from Group CEO or Deputy Chairman, stating the circumstances and the amount before the event and/or expenditure. If there are no written approval, the excess amount would be borne by the employee himself/herself.

#### **Conflict of Interest**

Our Group has clear guidelines with regards to the conflict of interest. Each employee is required to declare any conflict of interest to the Company on an annual basis.

#### **Whistleblowing**

A whistle-blowing policy and other procedures are put in place to provide our employees and parties who have dealings with us to report suspected fraud, corruption, dishonest practices or other improprieties in the workplace without fear of reprisal from internal and external sources.

#### **Disciplinary**

If our employees are established and/or reasonably suspected to have been involved in prohibited practices, depending on the severity, disciplinary actions will be taken including official warning, immediate dismissal of employment and/or referral to relevant law enforcement authorities.

**Declaration Form for Business Courtesies and Gifts**  
**Section A – To Be Completed By Employee Making The Declaration**

i) Employee Information

Name of Employee: \_\_\_\_\_  
Designation / Department: \_\_\_\_\_

ii) Details of Business Courtesies/Gift Received

S/N	Sender Name and Organization	Description of Gift and benefits received	Estimated Value (S\$)	Remarks

iii) Reason for receiving gift/business courtesies

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature of Employee: \_\_\_\_\_

Date: \_\_\_\_\_

**Section B – To be completed by HR**

Gift/Business Courtesies S/N	Valuation of gift or business courtesies	Source of Valuation	Recommended Action or Treatment

Signature of HR Personnel: \_\_\_\_\_

Date: \_\_\_\_\_

Signature of Approving Officer: \_\_\_\_\_

Date: \_\_\_\_\_

Name of Approving Officer  
Designation of Approving Officer