

# Anti-Bribery and Anti-Corruption Guide

Yinson has  
**ZERO** tolerance  
for bribery and  
corruption.



# **Gifts, Hospitality and Entertainment (GHE)**

**Before receiving or giving any  
form of gifts, hospitality or  
entertainment, go through  
this checklist:**

- ☐ Is either party offering or soliciting cash or a cash equivalent?
- ☐ Will it influence either party to make a biased decision?
- ☐ Is it made to obtain business or gain improper advantages?
- ☐ Does it exceed USD500 per person in value?
- ☐ If the person is a Government or Public Official, does it exceed USD25?

**Please take the following actions,**  
according to your answers  
to the checklist:

**YES**



**DO NOT** give or  
receive the offer

**UNSURE**



Check with  
Governance, Risk  
& Compliance  
Department (GRC)

**NO**



You may take action depending on  
the value of the gift.

**Please refer to the table  
on the next page.**

Value of GHE per person	Action to Take
Up to USD200	No action required
Above USD200 but not exceeding USD500	Declare it to GRC
Above USD500 but not exceeding USD1,000	Not allowed unless approved by one (1) Management Committee member <b><u>AND</u></b> GRC department with justification
Above USD1,000	Not allowed unless approved by Group CEO <b><u>AND</u></b> GRC department with justification

\*Note: Value of GHE on a per person basis.



## **Government and Public Official**

While it is the policy of the company to apply Anti-Bribery and Anti-Corruption (ABAC) measures to all parties, interactions with Government and Public Official are monitored especially closely due to their unique position to influence official decisions affecting our business, hence increasing the risk for violations of applicable ABAC laws. The threshold standard for GHE amount is USD25; any departure from this amount must be justified and approved according to the ABAC Policy & Procedure.



## **Facilitation Payments**

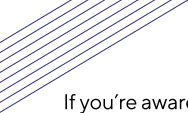
Never offer, promise, give, request or accept any facilitation payments. The only exception to this rule is if your personal health and safety is under threat.

## **Conflicts of Interest**

Avoid conflicts of interest in the workplace.

What is a conflict of interest?

- When someone can derive personal benefit from actions or decisions made in their official capacity;
- When someone allows business decisions to be influenced by personal interests or organisational interest.



If you're aware of a potential conflict of interest, please contact GRC immediately.

## **Sponsorships and Donations**

Corporate Social Responsibilities (CSR), sponsorships and/or donations must not be a disguise of bribery or conduit to fund illegal activities.

Before executing any charitable contribution, sponsorships or donations, please refer to the CSR Policy.

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For further information please visit  
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