

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 Risk
Management
and Compliance
Department
(RMC)

NO



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

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

Value of GHE*	Action to Take
USD100 and below	No action required
Between USD101 and USD300	Declare it to RMC
Between USD301 and USD500	Get approval from RMC or a Management Committee (MC) member
Above USD500	Not allowed unless approved by two (2) MC members and RMC with justification
Above USD1000	Not allowed unless approved by Group CEO and RMC with justification

* Note: Value of GHE on a per person basis



Government and Public Officials

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 Officials 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.



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.



If you're aware of a potential conflict of interest, please contact the Legal Department or RMC immediately.

Sponsorships and Donations

Before executing any charitable contribution, sponsorship or CSR activity, please refer to the CSR Policy and complete the CSR Evaluation form together with the CSR Proposal.

This process assesses whether the receiving party aligns with our ABAC and other related policies.

RELIABLE
OPEN
ADAPTABLE
DECISIVE
SUSTAINABLE

Passionately delivering
powerful solutions



For further information please visit
yinson.com/ABAC