

1 PURPOSE

This document is the property of City Facilities Management Group of Companies (Asia) which includes the following:

No.	Country	Company Name
1.	Malaysia	City Facilities Management Sdn Bhd
2.	Singapore	City Facilities Management (SGP) Pte. Ltd.
3.	Hong Kong	City Facilities Management (HKG) Limited
4.	Macau	City FM (Macau) Limited

This policy sets out the Anti-Bribery & Anti-Corruption Policy City Facilities Management Group of Companies (Asia) and its related bodies corporate (collectively “we”, “us”, “our” or “City FM”).

City FM has a commitment to act with honesty and integrity at all times. We recognise the importance of our reputation to all our clients, team members and suppliers and the importance in behaving with integrity.

City FM commits to follow local laws and regulations on anti-bribery and anti-corruption. We do not tolerate, permit, or engage in bribery, corruption, improper payments or unethical practices of any kind in our business dealings anywhere in the world, whether in the public or private sector.

2 SCOPE

City FM is committed to implementing and regularly reviewing processes, procedures and controls to monitor bribery and corruption risk and to ensure robust ethical management. It is the City FM’s policy to ensure that its businesses, senior management and other team members comply with all legislation designed to combat bribery and corruption in the jurisdictions in which they operate.

City FM will take steps to prevent bribery by our team members, suppliers or associated persons. The policy will address four main areas:

- a) **Bribing another person**
This is defined if you offer, promise or give an advantage (financial or other) to another party where you intend that advantage to induce the other party to perform improperly a relevant function or activity or reward such conduct.
- b) **Being bribed**
Same definition as above except that you are the recipient in the transaction.
- c) **Bribing a Foreign Official**
Any inducements to foreign officials, even if custom and practice in that country.

d) **Failure to prevent bribery**

The business can be liable if any party associated with it bribes another person for the ultimate benefit of the business.

This policy sets the City FM's stance on the implementation and management of anti-bribery and anti-corruption measures across the City FM's business operations in accordance with relevant government legislation.

The following policy principles address the main areas of risk associated with corporate bribery and corruption. These procedures cannot address every conceivable situation, but the spirit of the procedures should be followed at all times to help you make the right decision. Always err on the side of caution and if you are in any doubt, contact your Head of Department or Human Resources Department before taking any action.

3 POLICY

3.1 Gifts & Entertaining

City FM has a "Conflict of Interest" policy and team members should actively promote this to suppliers, agents and contractors. In the event that a team member receives a gift, that gift is to be forwarded to the business or Human Resources Department accompanied by any required documentation.

3.2 Giving or Receiving Gifts

No gifts of property or money should ever be accepted by team members from any person. If any person connected with our business offers any such gifts the offer must be reported to the business or Human Resources Department.

Promotional gifts may be given as a token of goodwill or to promote a brand, with prior approval from senior management.

City FM promotional gifts can include low value gifts such as coffee mugs, ballpoint pens, notepads, calendars and greeting cards bearing a City logo or trademark. It is important that a gift or payment must not be given to influence any business decision or act or decision of a government or public official in his or her official capacity.

3.3 Events & Entertainment

Events and entertainment include offers associated with meals, drinks, sporting events and entertainment functions. Offers of this nature must not be accepted from suppliers or business partners.

Attendance at a publicly accessible events is only permitted if the attendee has business approval and the cost to attend is paid for by City. Examples of such events may be tradeshow, seminars or industry conferences.

The event must be essential to business requirements, where by the primary purpose of the event is focused on business issues. Attendance at such an event must be approved before an invitation is accepted or an RSVP is given. The **Events Approval Form** must be signed by business leader, retain a

copy for your records and forward the signed original copy to Human Resources Department to be placed in the team members employment file.

Study or innovation tours must demonstrate a business justification and have appropriate authorisation and transparency. Business approval must be obtained for local product study / innovation tours, and Regional Asia Director's approval for international.

Team members must not request invitations / tickets / entertainment under any circumstances.

4 DONATIONS & SPONSORSHIPS

4.1 Political Donations

City FM will not make any political contributions or donations in cash or kind.

We do not make contributions to political parties, organisations or individuals engaged in politics as a way of obtaining an advantage in business.

Care must also be taken in supporting events and other activities of government, local authorities, political parties and public officials. Such support must not be perceived to exert any improper influence.

There needs to be a legitimate business reason for supporting the event and the amounts involved should be reasonable. Any payment to attend an event must be made to a political party or organisation rather than to an individual politician. Any attendance at, or support of, political conferences or dinners must be pre-approved by business.

4.2 Charitable Donations

City FM is keen to support charities, particularly those in our local communities. However, donations to charities can be used as a means of paying bribes. Donations should only be given to reputable, legitimate and registered charities and must not form an inducement to do business which may not otherwise be undertaken.

All Charitable Donations must be approved by business and recorded in our **Donations & Sponsorship Register Form**. This form is then to be forwarded to Human Resources Department.

4.3 Sponsorships

In line with the above clause 4.2 regarding Charitable Donations, any non-business sponsorship must not form an inducement to do business which may otherwise be undertaken. Non-business sponsorship may include, but are not limited to:

- a) Sponsoring youth football / sports teams;
- b) Sponsoring of individuals to assist with developing young talent; and/or
- c) Sponsorship of local community or school projects.

All non-business sponsorship must be signed off by business and to be recorded in our **Donations & Sponsorship Register Form**. This form is then to be forwarded to Human Resources Department.

5 THIRD-PARTY AGENTS

There are times when we require the services of third-party agents, consultants and business development services. This policy aims to prevent bribery involving associated persons. Associated persons are defined as a person or company who performs services to City FM. This includes Suppliers, Subcontractors and Third-Party Agents.

Third-Party Agents must be carefully selected and subject to a written agreement detailing the service that they are providing to City FM. This contract must include a statement on their understanding and compliance of the various government anti-bribery and anti-corruption legislation.

Third-Party Agents must not pay consultancy fees to public officials or to employees or business partners of anyone to whom we are tendering or looking to do business with.

6 SUPPLIERS & SUBCONTRACTORS

All suppliers and subcontractors should be aware of their responsibilities within the various anti-bribery and anti-corruption government legislation and City FM commitments to comply with these acts.

All new subcontractor approval packs include a section on their agreement to comply with this policy and it is an essential requirement for the subcontractor to agree to this before acceptance on to any City FM's approved subcontractor base.

7 TRAVEL & BUSINESS EXPENSES

There may be times when a business person or public official is required to travel to attend a meeting in connection with our business. In certain circumstances it may be appropriate for us or an associated person to pay for the individual's reasonable travel costs, accommodation and subsistence (meals and drinks).

Team members and associated persons may only pay for the reasonable costs of an individual's meals, accommodation or travel if the expenses are necessary and ancillary to a proper meeting relating to our business. The expense must not be capable of being construed as improperly influencing the individual in his or her decision making.

In respect of public officials, it is important to ensure that the public official is entitled to have his or her expenses met. Their employer must be told in advance and the employer's approval must be given.

Expenses should be paid directly from City FM or the associated person to the contact / official's employer or City FM should arrange the travel and accommodation in line with our existing Company Business Travel Policy, rather than reimbursing the individual directly. The costs involved should be reasonable and receipted. Cash payments should not be made.

a) Travel

What amounts to a "reasonable" expense will vary according to the circumstances and to the country in question. It will generally be reasonable to pay for economy or business class travel in accordance with our Company Business Travel Policy.

b) Accommodation

It may be appropriate to pay for a business person or public official's accommodation needs which are directly related to a business meeting.

Under no circumstances should you offer or provide accommodation to a relative, a spouse or partner of the business person or public official. You should also not pay for accommodation for more than one night after the meeting unless exceptional circumstances arise such as the business person or official's flight being delayed or cancelled.

c) Meals

It may be appropriate to pay a reasonable amount for a business person or public official's meals which are directly related to a meeting. Receipts must be provided.

8 FACILITATION PAYMENTS

City FM makes no distinction between bribes and improper “facilitation” or “grease” payments made personally to individual officials or government employees to speed up or make a transaction or administrative process happen (for example, customs clearance). For these purposes, a “facilitation” or “grease” payment does not include legitimate payments to government departments to accelerate a process (for example, legitimate fast track customs clearance which has been authorised by local law).

Our team members or associated persons must not make facilitation payments in connection with our business. Sometimes such payments are demanded in a threatening way. If you believe that your (or anybody else's) health, safety, personal security or welfare would be in danger if you do not make the payment, we would not expect you to refuse to make it.

If it's safe to do so, you should at first refuse to pay. If you decide to make the payment due to any perceived threat, then you must immediately report what happened to your Head of Department, Head of Human Resources and business leader. The cost must be accurately recorded as an “Extortion Payment”. An example of this situation would be where a Customs Official makes a demand for payment together with a threat that if payment is not made the person may be detained.

City FM will act to try and stop the situation recurring which may include speaking with the local authorities, local chamber of commerce and/or the local embassy.

9 REPORTING CONCERNS

All team members must report any breaches or potential breaches of the Anti-Bribery & Anti-Corruption Policy as soon as possible to your Head of Department or (if the team member wishes to remain anonymous) in accordance with the Whistleblower Policy. If you believe your Head of Department is involved in your concern, then you should discuss with the next level of management.

Alternatively, you can contact the person-in-charge as per details set out below.

a) For Malaysia

Person-In-Charge	Head of Human Resources
Address	A-9-2 & A-9-3, Level 9, Tower A, Menara UOA Bangsar, No. 5, Jalan Bangsar Utama 1, 59000 Kuala Lumpur

Contact No.	+60 3 2721 9300
E-mail Address	tan.kienlok@cityholdings.asia

b) **For Singapore**

Person-In-Charge	Human Resources Manager
Address	152 Beach Road, #11-03/04A Gateway East, Singapore 189721
Contact No.	+65 6951 8230
E-mail Address	Derek.Tang@cityholdings.asia

c) **For Hong Kong & Macau**

Person-In-Charge	Head of Human Resources
Address	37F AIA Tower, Landmark East, 100 How Ming Street, Kwun Tong, Hong Kong
Contact No.	+852 3708 5418
E-mail Address	Nora.Chan@cityholdings.asia

Any third-party agent, supplier or subcontractor who suspects or is aware of any violations of our Anti-Bribery & Anti-Corruption Policy must immediately notify their contact within the company or (if the person wishes to remain anonymous) report the violation in accordance with the Whistleblower Policy.

We will take all reported concerns seriously and will confidentially investigate to determine if the law or the Anti-Bribery & Anti-Corruption Policy has been contravened. All reported concerns in relation with this policy will be relayed to the business leaders including the outcome of any investigation.

Any team member who, in good faith, reports suspected legal, ethical, or policy breaches will not suffer any adverse consequences for having done so.

If you report a suspected breach or bribery concern, we will make every effort to keep your identity private.

10 RELATIONSHIP WITH EXISTING POLICIES

This policy has been formulated within the context of Whistleblower Policy and Conflict of Interest Policy.

11 MONITORING & REVIEW

This policy is reviewed at least once every three years by the business. We will continue to review the effectiveness of this policy to ensure it is achieving its stated objectives.

12 DOCUMENT CONTROL

Approval

	Title	Name	Date
Administrator	Head of HR – MYS, SGP & HK	N/A	1 June 2020
Approver	Regional Director – Asia	Mark Bradley	1 June 2020

Version History

The following table lists the changes made to this Policy:

Version	Date	Amended By	Brief Summary of Changes