

Asia Symbol Anti-bribery and Corruption Policy 亚太森博集团反贿赂和反腐败政策

1 Purpose 宗旨

- 1.1 This Policy defines the minimum standards which AS and all Personnel must comply with in order to ensure compliance with Applicable ABC Laws. 为确保遵守所适用的反贿赂和反腐败法律规定，本政策规定了亚太森博集团及其所有员工必须遵守的基本标准。

2 ABC Policy Statement 反贿赂和反腐败政策声明

- 2.1 AS is committed to conducting its business in compliance with all Applicable ABC Laws and strictly prohibits all forms of bribery and corruption both within its organisation and in respect of the actions of its Personnel and Business Partners. AS will implement and maintain effective measures to ensure compliance with and awareness of its ABC-related obligations. 亚太森博集团将确保业务开展遵守所有适用的反贿赂和反腐败法律，并严格禁止在组织内部及员工和商业伙伴的行为中发生任何形式的贿赂和腐败。亚太森博集团将持续采取有效措施，以确保了解并遵守反贿赂和反腐败的相关责任。
- 2.2 To give effect to this Policy, AS has adopted, and will maintain, an ABC Standard Operating Procedure. This Procedure sets out the key steps and principles for ensuring compliance with Applicable ABC Laws. Failure to comply with Applicable ABC Laws can lead to severe civil and criminal penalties, both for AS and individual Personnel, as well as significant reputational damage for AS. 亚太森博集团已使用并将维持一套《反贿赂和反腐败标准操作程序》以确保本政策的实施。该程序阐述了确保遵守适用的反贿赂和反腐败法律的关键步骤和原则。如不遵守适用的反贿赂和反腐败法律，可能会导致亚太森博集团和员工个人遭受严重的民事和刑事处罚，并对亚太森博集团的声誉造成重大损害。
- 2.3 AS takes a zero-tolerance approach to non-compliance with this Policy. Non-compliance is a serious matter amounting to wilful misconduct and may lead to disciplinary action, up to and including dismissal or termination of services. Personnel must report any suspected bribery, corruption or other violations of this Policy to either: the BG/BU Head; Corporate Legal; Head, Corporate Control; or, alternatively, in accordance with RGE's Whistleblowing Policy. 亚太森博集团对不遵守本政策的行为采取零容忍态度。不遵守本政策是非常严重的事件，等同于明知故犯的行为，并可能导致纪律处分，最严重时将导致解雇或服务终止。员工必须报告任何涉嫌贿赂、腐败或其他违反本政策的行为，可向 BG/BU 负责人、公司法务、企业控制部门负责人中任一人报告，或按金鹰集团《举报政策》执行。

3 Definitions 定义

- 3.1 “ABC” means anti-bribery and corruption. “ABC”为“anti-bribery and corruption”的缩写，意为反贿赂和反腐败。
- 3.2 “Affiliates” means any person or entity that directly or indirectly controls, or is majority controlled by, or is under common control with, Asia Symbol. “关联方”指直接或间接控制亚太森博集团，或被亚太森博集团控制或共同控制的人士或实体。
- 3.3 “Anything of Value” is broadly construed and includes (but is not limited to) cash and cash equivalents in any amount; gifts and gift cards; meals, entertainment and other hospitality; travel and lodging; training; in-kind services; business for which fair value for services and/or supply is not rendered, employment, education or investment opportunities; contractual rights or interests; discounts or credits; commissions, kickbacks, rebates, loans or other compensation; payment of other expenses; and political donations or charitable contributions. “有价之物”应作广义解释，包括（但不限于）任何金额的现金及现金等价物；礼品和礼品卡；餐饮、娱乐和其他款待；旅游和住宿；培训；实物服务；未支付公允价值的服务和/或供应业务、就业、教育或投资机会；合同权益；折扣或信贷；佣金、回扣、返利、贷款或其他报酬；支付其他费用；以及政治捐款或慈善捐款。

- 3.4 “**Applicable ABC Laws**” means any law, rule, regulation, or other legally binding measure of any jurisdiction that relates to bribery and corruption applicable to AS and its Personnel or Business Partners. “适用的反贿赂和反腐败法律”是指适用于亚太森博集团及其员工或商业伙伴的、与贿赂和腐败相关的任何司法管辖区的任何法律、规则、法规或其他具有法律约束力的措施。
- 3.5 “**BG**” means business group. “**BG**”为“business group”的缩写，指业务集团。
- 3.6 “**Books and Records**” means accounts, correspondence, invoices, memoranda, tapes, discs, papers, books and other documents or transcribed information of any type. “账簿和记录”是指帐目、函件、发票、备忘录、磁带、光盘、纸质文件、账簿和其他文件或任何类型的转录信息。
- 3.7 “**BU**” means business unit. “**BU**”为“business unit”的缩写，指业务单元。
- 3.8 “**Business Partner**” includes any third party who at any time performs (or who is intended to perform) services which involve other third parties for or on behalf of AS or its Affiliates, such as agents, intermediaries, consultants, dealers and sub-dealers, distributors, franchisees and sub-franchisees, licensees, contractors, shipping agents, customs agents, sales agents, brokers, suppliers and vendors, business contacts, representatives, middlemen, introducers, sponsors, advisers, service companies, operations support companies and potentially Government Officials. “商业伙伴”包括在任何时候为亚太森博集团或其关联方，或代表亚太森博集团或其关联方提供（或打算提供）服务的任何第三方，例如代理人、中介人、咨询顾问、经销商和次级经销商、分销商、特许经营商和次级特许经营商、被许可人、承包商、船运代理、海关代理、销售代理、经纪人、供应商和销售商、业务联系人、代销人、中间人、介绍人、赞助商、顾问、服务公司、运营支持公司和潜在的政府官员。
- 3.9 “**Corporate Control**” means the controls department of AS. “企业控制”是指亚太森博集团的控制部门。
- 3.10 “**Corporate Legal**” means the legal department of AS. “公司法务”是指亚太森博集团的法律部门。
- 3.11 “**Counterparty**” means any third party who enters into an agreement with AS or its Affiliates. “交易方”是指与亚太森博集团或其关联方签订协议的任何第三方。
- 3.12 “**Facilitation Payments**” are typically small, unofficial payments made to secure or expedite a routine task or service by a Government Official or other person to which an individual or company is otherwise legally entitled (such as speeding up the processing of a visa application). “疏通费”通常是指为完成或加快完成政府官员或其他人士提供的原本由个人或公司依法有权享受的常规事务或服务而支付的小额非官方款项（例如加快签证申请处理速度）。
- 3.13 “**Government Official**” means any:
(1) officer, employee or agent of any government or public international organization (e.g., United Nations, World Bank), including its agency or department;
(2) officer, employee or agent of a company or business owned (even partially), controlled, or operated by any government or public international organization (or its agency or department);
(3) officer, employee or agent of a political party;
(4) candidate for political office;
(5) leader of an indigenous or other native title-holding group;
(6) person acting on behalf of any of the foregoing.
- “政府官员”是指：
(1) 任何政府或国际公共组织（如联合国、世界银行）的官员、雇员或代理人，包括其代理机构或部门；
(2) 任何政府或国际公共组织（或其代理机构或部门）拥有（甚至部分拥有）、控制或经营的公司或商业机构的官员、雇员或代理人；
(3) 政党的官员、雇员或代理人；
(4) 政治职务候选人；
(5) 土著或其他土著所有权持有团体的领导人；
(6) 代表上述任何一方行事的人士。

- 3.14 “High ABC Risk Countries” refers to countries with an increased risk of or known to be commonly associated with bribery and corruption as identified by receiving a score of less than 30 on Transparency International’s most recent Corruption Perception Index (2020 as of the Effective Date of this Policy). The list of these countries is set out in Appendix A of this Policy. “反贿赂和反腐败高风险国家”是指在非政府组织“透明国际”最新出台的全球清廉指数中评分低于 30 的国家，其贿赂和腐败风险日趋增高或通常与贿赂和腐败联系在一起（该政策自 2020 年起生效）。相关国家名单请参见本政策附录 A。
- 3.15 “Personnel” means officers, directors and employees of AS and any person working under a contract for services with AS. “员工”是指亚太森博集团的管理人员、董事和雇员，以及在与亚太森博集团签订和履行服务合同中工作的任何人士。
- 3.16 “AS” means Asia Symbol and/or its Affiliates. “AS”是亚太森博集团和/或其关联方。

4 Scope 适用范围

- 4.1 This Policy applies to all: 本政策适用于所有：
- (a) Personnel; 员工；
 - (b) Business Partners engaged or proposed to be engaged by AS; and 亚太森博集团聘用或拟聘用的商业伙伴；和
 - (c) AS operations, including all legal entities and joint ventures over which AS is able to exercise control over policies and procedures. For those joint ventures over which AS is unable to exercise control, AS will endeavour to influence the joint venture’s policies and practices, so that they reflect the values described in this Policy. 亚太森博集团业务运营，包括亚太森博集团能够对其政策和程序行使控制权的所有法律实体和合资企业。对于亚太森博集团无法控制的合资企业，亚太森博集团将努力影响合资企业的政策和行为，以使其体现本政策中所述的价值观。

5 What are bribery and corruption? 贿赂和腐败定义

- 5.1 It is important that AS and all Personnel and Business Partners understand what AS means by bribery and corruption and AS’s prohibition of these activities: 亚太森博集团以及所有员工和商业伙伴务必了解亚太森博集团对贿赂和腐败的定义，并清楚亚太森博集团禁止从事此类活动：
- (a) **Corruption** is generally understood as the abuse of power for private gain. 腐败通常理解为滥用权力来谋取私利。
 - (b) **Bribery** is more specific and refers to the direct or indirect giving, promising, offering, receiving, agreeing to receive, requesting, soliciting or accepting of Anything of Value to or from any person in order to influence them corruptly or improperly in the exercise of their duty, or to be so influenced, or to secure or reward an improper benefit. 贿赂则更为具体，是指接受任何人或向任何人提供直接或间接的给予、承诺、供给、接收、同意接收、要求、索取或接受有价值之物，以在其履行职责时对其产生腐败或不正当的影响，或被其影响，或获取或给予不当利益。
- 5.2 All Personnel and Business Partners are expressly prohibited from engaging in bribery and corruption in any form and must avoid any conduct that creates even the appearance of bribery or corruption occurring. 明确禁止所有员工和商业伙伴从事任何形式的贿赂和腐败行为，避免任何形式的贿赂或腐败现象的行为发生。

6 Compliance with Applicable ABC Laws 遵守适用的反贿赂和反腐败法律

- 6.1 The key areas of ABC risk that are likely to arise in the courses of AS’s business operations include: 亚太森博集团业务运营过程中可能出现反贿赂和反腐败风险的主要领域包括：

- (a) engagement of Business Partners; 商业伙伴接洽;
- (b) interactions with Government Officials; 与政府官员之间的往来;
- (c) gifts and hospitality; 礼品和款待;
- (d) sponsorships and donations; 赞助和捐赠;
- (e) recruitment; 招聘;
- (f) Facilitation Payments and personal safety payments; and 疏通费和人身安全费; 以及
- (g) Books and Records and internal controls. 账簿、记录和内部控制。

Engagement of Counterparties and Business Partners m 交易方和商业伙伴接洽

- 6.2 All dealings with Counterparties and Business Partners shall be carried out with the highest ethical standards and shall comply with all Applicable ABC Laws. Personnel must not circumvent this Policy or any other AS policy by using a Business Partner to do what AS could not do itself. 与交易方和商业伙伴展开的所有交易均应按照最高道德标准进行, 并应遵守所有适用的反贿赂和反腐败法律。员工不得借由商业伙伴开展亚太森博集团自身无法开展的事务来规避本政策或任何其他亚太森博集团政策。
- 6.3 Payments to a Business Partner, when it is known or believed that there will be a resulting bribe to a Government Official, an individual, or any entity, are prohibited. 当明确知晓或认为向商业伙伴支付款项将会作为向政府官员、个人或任何实体行贿时, 该等款项禁止支付。
- 6.4 AS must conduct reasonable due diligence on all potential Business Partners to ensure that AS only enters into business relationships with reputable and qualified Business Partners that are willing and able to comply with this Policy. AS's relationships with all Business Partners must be fully and appropriately documented. 亚太森博集团必须对所有潜在商业伙伴开展合理的尽职调查, 以确保亚太森博集团仅与愿意并能够遵守本政策的、信誉良好且符合资格的商业伙伴建立业务关系。亚太森博集团与所有商业伙伴建立的关系均须完整且恰当地记录在案。
- 6.5 For further guidance on Business Partners incorporated, located or operating in High ABC Risk Countries, including appropriate due diligence to be performed and relevant contractual provisions, please refer to the ABC Standard Operating Procedure. 有关在反贿赂和反腐败高风险国家注册、设立或运营的的商业合作伙伴的进一步指导, 包括开展适当的尽职调查和相关合同条款, 请参阅《反贿赂反腐败标准操作程序》

Interactions with Government Officials 与政府官员之间的往来

- 6.6 Particular care should be exercised when dealing with Government Officials, especially in High ABC Risk Countries, as bribery of Government Officials is prohibited under Applicable ABC Laws. 在与政府官员打交道时应特别小心, 尤其是在反贿赂反腐败高风险国家, 因为适用的反贿赂和反腐败法律禁止贿赂政府官员。
- 6.7 The payment of reasonable and bona fide business expenditures to Government Officials is permitted in certain circumstances. However, in no case may the payment of business expenditures be made with the intent to improperly influence a Government Official. 在某些情况下, 向政府官员支付合理且正当的业务支出是在允许范围内的。但是, 在任何情况下都不得以不当影响政府官员为目的来支付此类业务支出。

- 6.8 For further guidance on interactions with Government Officials, please refer to RGE's Political Donations and Activity Policy CL122. 关于与政府官员往来的进一步指导, 请参阅金鹰集团的《政治捐赠和活动政策 CL122》。

Gifts and hospitality 礼品和款待

- 6.9 Exchanging reasonable gifts of nominal value and sharing hospitality (e.g., coffee, meals) in connection with a legitimate business purpose can foster constructive business relationships. However, gifts and hospitality are considered Anything of Value under the Applicable ABC Laws. 出于合法的商业目的交换微不足道的合理礼物和给予款待(例如咖啡、餐点)可以促进建设性的业务关系。然而, 根据适用的反贿赂和反腐败法律规定, 礼品和款待被视为“有价之物”。
- 6.10 Personnel and Business Partners who improperly provide gifts and hospitality can erode trust in AS and such conduct can be a mask for bribery. Improper behaviour includes any excessively lavish, frequent or otherwise inappropriate gifts or hospitality that is more than a routine social courtesy. 员工和商业伙伴不当提供礼品和款待会有损亚太森博集团的信誉, 且此类行为可能成为行贿的幌子。不当行为包括超出常规社交礼仪的任何过于奢侈、频繁或其他不恰当的礼品或款待。
- 6.11 Personnel and Business Partners must never offer, give or receive gifts and hospitality to affect, or appear to affect, the ability of the recipients to make objective business decisions or in exchange for preferential treatment. 员工和商业伙伴决不得提供、给予或接收礼品和款待, 以影响或试图影响接受者做出客观商业决策或换取优惠待遇。
- 6.12 For further guidance on the steps to take before providing or receiving gifts and hospitality, please refer to RGE's policy HR308.7 on Gifts, Sponsorship, Entertainment and Sponsored Travel. 关于在提供或接收礼品和款待之前应采取步骤的进一步指导, 请参阅金鹰集团《礼品、赞助、款待和赞助旅行的政策 HR308.7》。

Sponsorships and donations 赞助和捐赠

- 6.13 AS does not allow contributions to political parties and/or to candidates for political office. No Personnel or Business Partner is to make a political contribution stated to be, or which could be interpreted to be, made on AS's behalf. 亚太森博集团不允许向政党和/或政治职位候选人捐款。任何员工或商业伙伴均不得作出声称或可被解读为代表亚太森博集团进行政治捐款。
- 6.14 AS may make charitable donations and provide sponsorship to not-for-profit organisations and other charities. However those donations must be ethical and legal under Applicable ABC Laws. Any charitable donations made by AS (or in its name) must be approved in accordance with RGE's Political Donations and Activity Policy CL122. 亚太森博集团可向非盈利机构及其他慈善机构进行慈善捐款及提供赞助。然而, 根据适用的反贿赂和反腐败法律, 这些捐赠必须合乎道德且合法。由亚太森博集团(或以其名义)进行的任何慈善捐款必须根据金鹰集团《政治捐款和活动政策 CL122》获得批准。
- 6.15 Personnel may join political associations or make donations to political parties provided that this is done in the personal capacity and time of the Personnel, and being made clear at all times that AS is not connected in any way with such political activity or donations. 员工可以加入政治协会或向政党捐款, 但必须以个人身份和在私人时间进行, 并始终明确亚太森博集团与此类政治活动或捐款不存在任何关联。
- 6.16 For further guidance on these matters, please refer to RGE's Political Donations and Activity Policy CL122. 有关这些事项的进一步指导, 请参阅金鹰集团的《政治捐款和活动政策 CL122》。

Recruitment 招聘

- 6.17 While there is no absolute prohibition on hiring persons recommended by others, hiring decisions ought not be based on AS's business transactions. Offers of employment should not be given in exchange for any benefit to be received by AS, and Personnel should not offer employment in order to seek any advantage in any business activity. Government Officials and their relatives should only be hired as Personnel if they are

qualified for the position and remunerated in line with fair market value. 虽然没有绝对禁止雇佣他人推荐的人士，但雇佣决定不应基于亚太森博集团的商业交易。提供就业机会不应作为亚太森博集团获得利益的交换，且员工不应为了在业务活动中寻求利益而提供就业机会。政府官员及其亲属只有在符合职位要求且薪酬符合公平市场价值的情况下，才可被聘为员工。

- 6.18 All Personnel responsible for recruitment must subject all new recruits to pre-employment screening checks and ensure that such checks have been concluded satisfactorily before any offer of employment is made. 负责招聘的人员必须对所有新招聘人员进行入职前的筛选审查，并确保在发出聘用意向书之前以符合要求的方式完成此类审查。

Facilitation Payments and personal safety payments 疏通费和人身安全费

- 6.19 Facilitation Payments can amount to bribery under Applicable ABC Laws and are, in most situations, illegal. 根据适用的反贿赂和反腐败法律规定，疏通费可能构成贿赂，且在大多数情况下是非法的。
- 6.20 AS strictly prohibits the paying of Facilitating Payments in the conduct of its business. If you make or are asked to make a Facilitation Payment on AS's behalf, you must immediately report the incident (in writing) to the BG/BU Head. 亚太森博集团严格禁止在开展其业务时提供疏通费。如果您代表亚太森博集团支付或被要求支付疏通费，您必须立即（以书面形式）向 BG/BU 负责人报告该事件。
- 6.21 On occasion, a Government Official, someone claiming to act on the Government Official's behalf, or others may attempt to solicit or extort Anything of Value from AS, its Personnel and/or its Business Partners. 偶尔可能会存在政府官员、声称代表政府官员行事的人员或其他人试图向亚太森博集团、其人员和/或其商业伙伴索取或勒索有价值之物。
- 6.22 If you face an extortion or demand that involves explicit or implicit threats to your personal safety and you have a reasonable belief that you are in imminent jeopardy of serious bodily harm or loss of liberty and no other prudent alternative is available, you may make payments which would otherwise be prohibited under this Policy. In such circumstances: 如果您面临给您的人身安全带来明确或暗示威胁的勒索或要求时，并且您有理由相信您即将遭受严重的身体伤害或失去人身自由的危险，而且您没有其他合适的替代解决方案，您可以支付本政策在其他情况下禁止支付的款项。在此等情形下：
- (a) you should always record in AS's books and records the details including the reason for the payment, the date of the payment and the identity of the recipient; and 您应始终在亚太森博集团的账簿和记录中记下有关该款项的详细信息，包括付款原因、付款日期及收款人的身份；并且
 - (b) you should report the extortion payment as quickly as reasonably practicable to Corporate Legal and Head, Corporate Control to determine the action to be taken. 您应在合理可行的范围内尽快向公司法务和企业控制负责人汇报该勒索付款，以决定应采取何种行动。

Books and Records and Internal Controls 账簿和记录和内部控制

- 6.23 AS maintains detailed and accurate Books and Records of all expenditures made by AS or on its behalf and maintains a system of internal controls that ensures accountability for all of AS's funds and assets. AS will maintain available for inspection accurate Books and Records, in reasonable detail, that accurately and fairly document all financial transactions, risk assessments and due diligence. 亚太森博集团会对亚太森博及其代表的所有支出进行详细准确的记账并记录，保持对于亚太森博集团所有资金和资产负责的内部控制系统。亚太森博集团将合理准确地保存所有金融交易、风险评估和尽职调查的账簿和记录，以供检查。
- 6.24 All Personnel and Business Partners are strictly prohibited from making any payments without correct supporting documentation, including any "off the books" payments or other fraudulent accounting practices such as altering or falsifying Books and Records to disguise or cover up payments, the payment of false or fraudulent invoices, omission of relevant information, miscoding of the general ledger or falsifying of expense reports. 严禁任何员工和商业伙伴在没有恰当支持文件的情况下进行任何支付，包括任何

“账外”支付或其他会计造假，例如更改或伪造账簿和记录以掩饰或掩盖支付、虚假或欺诈性发票支付、遗漏相关信息、总账错误编码或伪造费用支出报告。

7 Training 培训

- 7.1 All Personnel will receive ABC training at induction. Personnel in senior positions or those who are responsible for performing Business Partner due diligence measures in accordance with the ABC Standard Operating Procedure will receive additional tailored training on AS's Business Partner due diligence process. This training will be repeated on a periodic basis. 所有员工入职时均会接受反贿赂和反腐败培训。高级职位员工或负责依据《反贿赂和反腐败标准操作程序》执行商业伙伴尽职调查的员工将额外接受有关尽职调查流程的针对性培训。此类培训将周期性举办。
- 7.2 Where appropriate, training will be provided to certain Business Partners in accordance with the ABC Standard Operating Procedure. 在适当的情况下，将根据《反贿赂和反腐败标准操作程序》向特定商业伙伴提供培训。
- 7.3 If you have not received training, but believe that you should, please contact your line manager. 如果您没有接受过培训，但认为自己应该接受培训，请联络您的分管经理。

8 Breaches of Policy 违反政策

- 8.1 All Personnel must ensure that they read, understand and comply with this Policy and that they avoid any activity that might lead to, or suggest, a breach of this Policy. Ignorance is not an excuse for non-compliance. 所有员工均必须确保阅读、理解并遵守本政策，并避免任何可能导致或显示违反本政策的活动。不了解不能作为不遵守本政策的借口。
- 8.2 Applicable ABC Laws generally criminalise conduct amounting to bribery and corruption. Disguising or concealing bribe payments in accounting records are also often criminal offences under Applicable ABC laws. The penalties for violating these laws are serious and can include severe fines and other penalties (e.g., debarment) for companies, and fines and imprisonment for individuals. 适用的反贿赂和反腐败法律通常将构成贿赂和腐败的行为定为犯罪。根据适用的反贿赂和反腐败法律定义，在会计记录中掩盖或隐瞒贿赂款项通常也构成刑事犯罪。违反这些法律将受到严厉处罚，可能包括对公司的巨额罚款和其他处罚（例如取消资格），以及对个人的罚款和监禁。
- 8.3 Some Applicable ABC Laws prohibit acts of bribery or corruption regardless of whether the conduct takes place in a public sector or private sector context. Further, some Applicable ABC Laws have extra-territorial effect, meaning that they apply to conduct occurring outside the countries where the laws have been enacted. 一些适用的反贿赂和反腐败法律禁止贿赂或腐败行为，无论此等行为发生在公共部门还是私营部门。此外，一些适用的反贿赂和反腐败法律具有域外效力，这意味着它们也适用于在相关法律颁布国以外发生的行为。
- 8.4 Further, bribes given or offered by any Personnel or Business Partner in order to retain business (or a business advantage) for AS may result in AS being convicted of an offence of failing to prevent that bribery, whether or not AS knew of the existence of the bribe. As a result, **breaches of this Policy must be avoided at all costs**. 此外，任何员工或商业伙伴给予或提供贿赂，以帮助亚太森博集团保留业务（或业务优势），都可能导致亚太森博集团因未能防止此等贿赂的发生而被定罪（无论亚太森博集团是否知晓此等贿赂的存在）。因此，必须不惜一切代价避免违反本政策。
- 8.5 Any Personnel who intentionally, negligently or otherwise fails to comply with this Policy shall be subject to disciplinary proceedings, including but not limited to suspension or dismissal (for employees, officers or directors of AS), where allowable by law, or termination of contract (for agents and any persons engaged under a contract for services with AS). For the avoidance of doubt, a breach of this Policy will be considered wilful misconduct. 任何员工故意、疏忽或以其他方式未能遵守本政策，都将受到纪律处分，包括但不限于在法律允许范围内的停职或解雇（针对亚太森博集团的雇员、高级管理人员或董事），

或终止合同（针对亚太森博集团代理及与亚太森博集团签订服务合同的任何人士）。为避免疑问，违反本政策即被视作故意不当行为。

- 8.6 Internal Audit and Human Resources shall be responsible for investigating allegations of bribery by Personnel or Business Partners and taking appropriate steps in response, such as the engagement of external consultants to conduct any such investigations and consulting with Head, Corporate Control and Corporate Legal as appropriate. 内部审计和人力资源部应负责调查员工或商业伙伴的贿赂指控事宜，并采取适当措施回应，如聘请外部顾问开展调查，并视具体情况与公司控制部门负责人和公司法务进行磋商。
- 8.7 AS will inform and work with the relevant local authorities in relation to any case of bribery or corruption committed by Personnel or Business Partners. 亚太森博集团将向有关地方当局通报员工或商业伙伴所犯的贿赂或腐败事宜，并就此与之展开合作。

9 Reporting non-compliance 报告不遵守本政策的行为

- 9.1 Any Personnel aware of or having reason to suspect actual or potential non-compliance with this Policy must report the matter at the earliest possible time to the BG/BU Head who shall consult with Corporate Legal and Head, Corporate Control. 任何员工发现或有理由怀疑已发生或可能发生不遵守本政策的行为，必须尽早向 BG/BU 负责人报告此事，BG/BU 负责人应就此咨询公司法务和公司控制部门负责人。
- 9.2 Personnel must not ignore suspicious circumstances indicating possible ABC risk. If you are unsure whether a particular act may constitute bribery or breach any Applicable ABC Law, or if you have any other queries, these should be raised with the BG/BU Head. 员工不得无视可能存在反贿赂和反腐败风险的可疑情况。如果您不确定某一特定行为是否构成贿赂或违反任何适用的反贿赂和反腐败法律，或者如果您有任何其他疑问，应向 BG/BU 负责人提出。
- 9.3 Reports of non-compliance can also be made directly to Corporate Legal and Head, Corporate Control or, alternatively, in accordance with RGE's Whistleblowing Policy. 有关违规行为可以直接向公司法务、公司控制部门负责人报告或根据金鹰集团的《举报政策》执行。
- 9.4 Once a suspicion or concern has been reported the matter should not be discussed with any person other than those responsible for investigating it until otherwise notified or the information is made public. 一旦报告了怀疑或担忧，在另行通知或信息公开之前，不应与负责调查的人员以外的任何人讨论此事。
- 9.5 AS understands that persons who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. All reports of wrongdoing will be treated in confidence. Please refer to RGE's Whistleblowing Policy for more detailed guidance. 亚太森博集团理解，拒绝接受或提供贿赂的人士，或提出担忧或举报他人不当行为的人士，有时会担心可能因此遭受波及。所有不当行为的报告都将得到保密处理。请参阅金鹰集团的《举报政策》获得更详细的指导。

10 Interpretation 解释

- 10.1 This Policy shall be interpreted by the respective BG/BU Head in consultation with Corporate Legal and Head, Corporate Control. 本政策应由各 BG/BU 负责人在咨询公司法务和公司控制部门负责人后解释。

11 Exceptions 例外情况

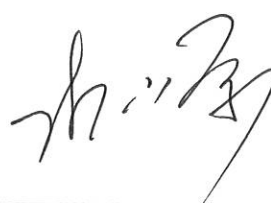
- 11.1 There is no exception, waiver or deviation from the requirements of this Policy. 本政策的要求不得存在任何例外、放弃或偏离情形。

12 Further information 补充信息

- 12.1 Compliance with this Policy is subject to ongoing monitoring, review and periodic auditing. 本政策的遵守情况将受到持续监控、审查和定期审计。
- 12.2 This Policy may be amended and updated by Corporate Legal and Head, Corporate Control from time to time. The latest version of this Policy is available from Head, Corporate Control. 本政策可由公司法务和企业控制部门负责人不时进行修订和更新。本政策的最新版本可从公司控制部门负责人处获取。
- 12.3 If you have any questions about this Policy, please contact the BG/BU Head or, alternatively, Corporate Legal. 如果您对本政策存有任何疑问，请与 BG/BU 负责人或公司法务联络。

13 Document Control 文件控制

Policy No. and Revision 政策编号和修订	Effective Date 生效日期	Change Description 更改说明
	20 De 2023 2023 年 12 月 20 日	Original 初始版本

Issued by 签发人
Max Chen Xiao Rong 陈小荣 Deputy Chairman, Asia Symbol Management Committee 亚太森博管理委员会副主任 

Appendix A

附录 A

High ABC Risk Countries 反贿赂和反腐败高风险国家

Afghanistan 阿富汗	Guinea 几内亚	North Korea 朝鲜
Angola 安哥拉	Guinea Bissau 几内亚比绍	Papua New Guinea 巴布亚新几内亚
Bangladesh 孟加拉	Haiti 海地	Paraguay 巴拉圭
Burundi 布隆迪	Honduras 洪都拉斯	Somalia 索马里
Cambodia 柬埔寨	Iran 伊朗	South Sudan 南苏丹
Cameroon 喀麦隆	Iraq 伊拉克	Sudan 苏丹
Central African Republic 中非共和国	Laos 老挝	Syria 叙利亚
Chad 乍得	Lebanon 黎巴嫩	Tajikistan 塔吉克斯坦
Comoros 科摩罗	Liberia 利比里亚	Togo 多哥
Congo 刚果	Libya 利比亚	Turkmenistan 土库曼斯坦
Democratic Republic of the Congo 刚果民主共和国	Madagascar 马达加斯加	Uganda 乌干达
Dominican Republic 多米尼加共和国	Mauritania 毛里塔尼亚	Uzbekistan 乌兹别克斯坦
Djibouti 吉布提	Mozambique 莫桑比克	Venezuela 委内瑞拉
Equatorial Guinea 赤道几内亚	Myanmar 缅甸	Yemen 也门

Eritrea 厄立特里亚	Nicaragua 尼加拉瓜	Zimbabwe 津巴布韦
Guatemala 危地马拉	Nigeria 尼日利亚	

For the most up-to-date list of High ABC Risk Countries, please contact Head, Corporate Control or Chief Legal Officer.

欲了解反贿赂和反腐败高风险国家的最新名单，请联系公司控制负责人或公司法务。