



ASIAGROUP LEASING PTE LTD ANTI-CORRUPTION & ANTI-BRIBERY POLICY

Asiagroup Leasing Pte Ltd is fully committed to conducting all business activities with integrity, honesty, and in strict compliance with all applicable anti-corruption and anti-bribery laws and regulations. Our organisation adopts a **zero-tolerance approach** toward corruption, bribery, fraudulent behaviour, improper payments, and all forms of unethical conduct.

This commitment applies to all employees, directors, subcontractors, agents, vendors, and any third parties acting on our behalf.

We uphold the ethical principles reflected in recognised corporate governance standards, including those outlined in the Asiagroup's Anti-Corruption Policy & Guidelines, and we strive to maintain the highest level of professionalism and transparency in our dealings with clients, partners, suppliers, authorities, and the public.

1. Prohibition of Bribery and Corruption

We strictly prohibit the offering, giving, requesting, or receiving of any bribe, kickback, facilitation payment, or improper advantage.

This includes — but is not limited to:

- Cash or cash equivalents
- Gifts, entertainment, or hospitality intended to influence decisions
- Favouritism in procurement or contract awards
- Undisclosed commissions or rebates
- Any benefit that compromises fairness, transparency, or integrity

Employees and representatives must never attempt to improperly influence business outcomes or gain favourable treatment.

2. Gifts, Hospitality & Entertainment

While we recognise that reasonable business courtesies may occur, any gift or hospitality must:

- Be modest and of appropriate value
- Not create an obligation or perception of undue influence
- Comply with company and client guidelines
- Be transparent and, where required, recorded

Improper or excessive gifts, entertainment, or personal benefits are strictly prohibited.



3. Conflicts of Interest

All employees and representatives must act in the best interests of the company and our clients.

A conflict of interest occurs when personal, financial, or external relationships may influence, or appear to influence, objective decision-making.

Any potential conflict must be:

- Declared promptly
- Reviewed by management
- Managed transparently to maintain integrity and fairness
- Employees must not participate in decisions where a conflict exists.

4. Dealings with Government, Clients & Third Parties

We maintain strict compliance when interacting with:

- Government agencies or officers
- Clients and their representatives
- Consultants, vendors, and subcontractors

Improper payments or inducements of any kind—regardless of local practice—are not allowed.

Third parties engaged on our behalf are expected to uphold the same standards, and we may terminate relationships with parties who violate these principles.

5. Reporting of Misconduct

We encourage all employees to raise concerns or report suspected violations of this statement.

Reports may be made confidentially to supervisors or management.

All cases will be reviewed fairly, objectively, and without retaliation against the reporting individual.

We take disciplinary action, including possible termination or legal reporting, against any employee or representative found involved in corruption or unethical behaviour.



6. Transparency, Record Keeping & Accountability

We maintain accurate and transparent records of transactions, procurement decisions, payments, and contractual dealings.

Falsification, concealment, or misrepresentation of records is strictly prohibited.

We are committed to internal controls that ensure compliance, detect irregularities, and uphold ethical business conduct.

7. Continuous Improvement

Asiagroup Leasing Pte Ltd will periodically update this statement to reflect evolving legal requirements, best practices, and client expectations.

We will provide necessary communication or awareness to ensure that our workforce and partners understand and uphold these principles.

8. Commitment to Clients

We support the creation of a transparent, safe, and corruption-free working environment and uphold the highest standards of professionalism across all operations.