

ANTI-BRIBERY & CORRUPTION POLICY STATEMENT

Great Eastern Labuan Company Limited (“Great Eastern Labuan”) takes a **ZERO-TOLERANCE APPROACH** to bribery and corruption and is committed to act professionally, fairly and with integrity, honesty and ethical manner in all business dealings and relationships.

Great Eastern Labuan prohibits bribery and corruption in business dealings, whether they take place directly or indirectly except for the limited circumstances as specified by the Company in Great Eastern Labuan Anti-Bribery and Corruption Policy. It emphasises the importance for all Associated Persons having mutual attitudes to counter, resolve and being accountable in managing bribery and corruption risks.

All Associated Persons shall not offer or accept Anything of Value to improperly influence any act, decision, transaction or obtain an advantage on behalf of Great Eastern Labuan. All Associated Persons are to comply with these principles in undertaking performance of any service for, or on behalf of Great Eastern Labuan.

Violation to relevant provisions and regulations will not be tolerated and will be penalised, including through disciplinary action, termination of contract and in certain circumstances, assisting legal enforcement agencies and appropriate authorities in any resulting prosecution. Further legal action may also be taken in the event that Great Eastern Labuan’ interests has been affected.

Salient principles and standards of Great Eastern Labuan Anti-Bribery and Corruption Policy

It should be noted that:

- Associated Persons cover all employees (whether temporary, contract and permanent), interns, directors (which includes Board Committee members), intermediaries, business associates, vendors, service providers, volunteers, or any person associated with Great Eastern Entities.
- Anything of Value is not limited to tangible items of economic value, but can include anything the recipient would find to be an advantage or benefit which includes, but not limited to cash, gifts, entertainment, meals, incentive trips, training, business, employment, investment opportunities, personal discounts or credits, political or charitable contributions, etc.
- All Associated Persons:
 - a) should avoid situations in which personal interest could conflict with their professional obligations or duties and must not use their position, official working hours, Company’s resources and assets, or information available to them for personal gain or to the Company’s disadvantages.
 - b) are prohibited from receiving, soliciting or asking for any form of gratifications i.e. gifts, entertainment, hospitality and travel/incentive trip. The receiving of gratifications or gifts as an inducement or reward for service rendered or to be rendered is an offence under the law.
 - c) should make any charitable contributions and sponsorships for or on behalf of the Company in good faith and transparent without bribery or corrupt intent.
 - d) should decline any facilitation payment request. Great Eastern Labuan adopts a strict policy of disallowing the use of facilitation payments in its business.
 - e) are strictly prohibited to make any political contribution and involve in political activities on behalf of the Company.

Raise your concerns relating to violation of the above, improper or reportable conduct issue at whistleblow@greateasternlife.com.