



HENGYUAN REFINING COMPANY BERHAD

(No. 3926-U)

(Formerly known as Shell Refining Company (Federation of Malaya) Berhad)

www.hrc.com.my

ANTI-BRIBERY AND CORRUPTION POLICY

In line with HRC's commitment to uphold Ethical Behaviour and Business Integrity, and in compliance with its Anti-Bribery and Corruption and Anti-Money Laundering Manual (ABC & AML Manual), we are committed to mitigating the risk of bribery and corruption within the Company.

In recognition of the above, the following shall be applied:

- HRC insists on honesty, integrity and fairness in all aspects of our business. Accordingly, HRC prohibits all forms of bribery and corruption during business dealings with our business associates. Facilitation payments shall not form part of our business culture;
- All business dealings must comply with all applicable anti-bribery and corruption and anti-money laundering laws and regulations;
- Staff and business associates must declare any conflict of interest before starting any business relationship;
- Staff and business associates must pledge their commitment annually in writing to HRC's ABC & AML Manual;
- Staff must adhere to the HRC "no gift" policy. Whenever accepting gift or hospitality is unavoidable, staff are obliged to declare it to the Risk & Integrity Department.
- No donation and sponsorships are allowed unless with approval from the CEO;
- HRC is politically neutral and does not make political payments of any kind;
- HRC has set up an independent and trustworthy Whistleblowing channel that allows staff and any member of the public to raise any concern in good faith and accords sufficient protection from any retaliation;
- Our Risk & Integrity Department is the Compliance Function focal point while the Board Risk Management Committee is the overall governing body;
- All business dealings must adhere to ISO 37001 – Anti Bribery Management System requirements;

All employees, contract staff and Business Associates are required to abide by this policy and any violation of this Policy may subject them to disciplinary action, including termination of employment, contracts or being blacklisted from further business dealings.

Wang Youde
CHAIRMAN of Hengyuan Refining Company Berhad
November 2020

Erkki Ranta
CEO of Hengyuan Refining Company Berhad
November 2020