



Memorandum

To : Directors and Employees
From : Tan Sri William Cheng
Group Executive Chairman
C.C. : Tan Sri Albert Cheng
Group Executive Director
Date : 2 January 2020
Subject : **Lion Group Anti-Bribery and Corruption Policy**

The Parliament of Malaysia has passed the Malaysian Anti-Corruption Commission (Amendment) Act 2018 to introduce corporate liability for corruption offences.

In line with the above, Lion Group has implemented the Anti-Bribery and Corruption Policy (ABC Policy) which reflects the Group's stand of zero tolerance against all forms of bribery and corruption, and its commitment to lawful and ethical conduct at all times.

The ABC Policy serves to provide guidance to all directors, employees and other stakeholders of the Group on how to deal with improper solicitation, bribery and other corrupt activities in order to achieve business or personal gains for themselves or others, that can be construed as having contravened the anti-corruption laws of Malaysia and applicable foreign laws.

Engaging in bribery or corrupt practices can have severe consequences for you and for the Group. Under the MACC Act, the Group and its officers may be charged for corrupt practices. You may face dismissal, fines and imprisonment, and the Group may face damage to reputation, financial loss and disbarment from business and other negative consequences.

This ABC Policy is available at www.lion.com.my and is to be disseminated to all directors and employees. Please contact the Group Risk & Compliance Department in the Head Office immediately should you need any advice or clarification on the policy.

To reiterate our stand against bribery and corruption, we will be including the following statement in all our emails:

ZERO TOLERANCE ON BRIBERY AND CORRUPTION

Lion Group of Companies have adopted a policy of zero tolerance on bribery and corruption as spelled out in its Anti-Bribery and Corruption Policy. All employees shall not offer, solicit, or accept bribes in order to gain business or personal advantages, or engage in any activity that can be construed as having contravened the anti-corruption laws of Malaysia and applicable foreign laws.

We are also introducing our pledge to be **ACCOUNTABLE. COMPETENT. TRANSPARENT** in the sign-off in all our correspondence.

We thank you for your support in upholding the Group's ABC Policy.

ACCOUNTABLE. COMPETENT. TRANSPARENT

Yours sincerely

A handwritten signature in black ink, appearing to be "W Cheng", written over a horizontal line.

Tan Sri William Cheng
Group Chairman