

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT 2018



TIAN YUAN HEALTHCARE
天元医疗

China Tian Yuan Healthcare Group Limited

(Incorporated in the Cayman Islands with limited liability)
(STOCK CODE: 557)

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Introduction

We continued to operate our business in an environmentally responsible manner. Since 2016, China Tian Yuan Healthcare Group Limited (the “Company”) has issued the Environment, Social and Governance (“ESG”) report in accordance with the Environmental, Social and Governance Reporting Guide set out in Appendix 27 to the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited focusing on our efforts around our ESG issues. This report covers the financial period from 1 January 2018 to 31 December 2018 (the “Reporting Period”).

The Company, its subsidiaries and their jointly-operated hotel (the “Group” or “we”) are principally engaged in the provision of integrated solutions, hotel management services, hospitality related services and reservation services in the United States of America (“the USA”). The Group is also involved in securities and fund investment, money lending and related business and healthcare services. The Group’s information has been set out in our Annual Report 2018 in greater details. Unless otherwise indicated, the analysis of this report covers our principal activities in respect of the hospitality segment which has a more significant bearing on the environmental and social impacts brought by the Group than other segments.

Caring our communities where we do business aligns with the Group’s goal – “Spirit To Serve Our Community”. The core value of the Group – to “Serve and Give Back our Community” – is important to our business. This report demonstrates the Group’s social responsibility and community investment.

Environmental Sustainability

Emissions and use of resources

Despite the fact that our operations generate very little pollution, policies were implemented to ensure that we did not violate the National Environmental Policy Act of the USA due to the emissions.

The Group continued to adopt the Group's best practice audit tool which covers a range of items from corporate re-use policies to simple best practice behaviors for lighting, appliance, heating, ventilation and air conditioning; and central plant conservation and efficiency. We implemented internal policy to provide guidance in order to comply with regulations and controlling energy consumption, water use and waste disposal. We rolled out our own developed tool which is an online environmental sustainability dashboard for collecting data and calculates the hotel's carbon and water footprint according to our internal guidelines.

As a commercial enterprise specializing in the provision of hospitality related services, our operations did not generate any production waste or any production-related pollution. We are aware that there were associated indirect emissions, e.g. carbon dioxide emission, being released from using electricity in daily operation both in offices or the hotel. The non-hazardous waste produced from our operation includes without limitation those produced through disposal of paper, consumption of water and use of transportation for business travel. The hazardous waste produced by our hotels from disposal of cleaning chemicals, retired light fittings and electrical equipments was handled properly in accordance with the applicable regulations and our internal procedures. As the volume of hazardous waste and non-hazardous waste produced was minimal, we did not record the volume of the hazardous and non-hazardous waste during the Reporting Period.

During the Reporting Period, the Group reduced emissions by various policies, which include without limitation:

- promoting the use of cleaner energy and renewable energy;
- improving energy efficiency;
- encouraging greening and raising guests and employee awareness;
- promoting the utilization of teleconference and video conference technology to participate in meetings; and
- reducing the usage of transportations.

During the Reporting Period, we are not aware of any activities which were not in compliance with the relevant laws and regulations that have a significant impact on the Group concerning air and greenhouse gas emissions, discharges into water and land or generation of hazardous and non-hazardous waste.

The air emissions produced by consumption of natural gas, mainly consumed for generating heat in the hotel and offices during the Reporting Period, were shown as follow:

	Kg
Sulphur Oxides (SO _x)	2
Nitrogen Oxides (NO _x)	450

Environmental Sustainability

The total greenhouse gases produced by energy indirect emission were mainly due to the generation of purchased electricity and natural gas in our hotel and office. The below diagram shows the total greenhouse gas produced during the Reporting Period.

	Kg
Carbon Dioxide (CO ₂)	2,056,261
Methane (CH ₄)	95
Nitrous Oxide (N ₂ O)	35
Total greenhouse gases	2,069,072
Greenhouse gases @occupied room	56.96

The other indirect emission produced for processing fresh water and sewage by government departments are minimal and therefore we did not take any record.

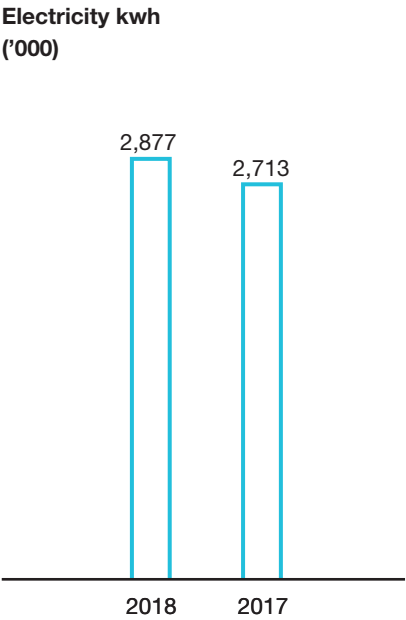
Polices are in place to integrate the environmental considerations into daily operation. The measures employed for reducing emissions are disclosed in the following section-"Electricity".

Electricity

The total consumption of electricity, shown as below, was maintained at a similar level for the year 2018 and 2017 respectively:

Electricity was mainly consumed for operating our hotel business in the USA. The average electricity consumed occupied room in our hotel was approximately 79.21 kwh/ square feet (2017: approximately 74.92 kwh/square feet).

The Group continued to provide different trainings in order to raise the employee's awareness on environmental protection and continued to adopt energy saving policy in offices and other working places.



Environmental Sustainability

Electricity consumption from lighting and electrical equipment has been monitored by the management of the Group to eliminate unnecessary usage and an annual maintenance schedule was in place to ensure that equipment operated efficiently. The level of consumption of electricity in the Reporting Period is similar to that of the previous reporting period. We have designated a specified team, which comprises middle level management members working in different departments, to investigate any irregular consumption of electricity and report the result to the management; however, during the Reporting Period no such irregularity has been discovered by the Group.

The Group saved energy by complying various policies, which include without limitation.:

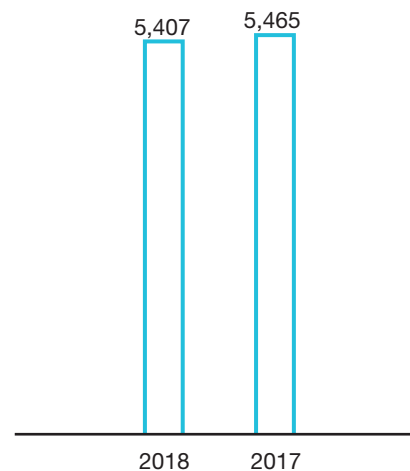
- turning off electric items when they are not in use to save energy;
- unplugging devices whenever possible to limit the flow of electricity;
- adjusting the temperature settings in our facilities;
- switching to LED light bulbs from halogen lightening;
- trading in our electric dryer for a good old-fashioned clothesline;
- encouraging the use of solar energy in common area when applicable.

Water

The total consumption of water, shown as below, was maintained at a similar level for the year 2018 and 2017 respectively:

The average water consumed for the occupied room in our hotel was approximately 149 gallons/square feet (2017: approximately 151 gallons/square feet).

**Water Gallons
(‘000)**



Environmental Sustainability

During the Reporting Period, we have reviewed the programs implemented to reduce water consumption, which include without limitation:

- installing lower flow faucet and toilet fixtures and self-closing taps;
- installing low-flow shower heads and toilets and more efficient laundry and dish washing facilities;
- installing equipment and applying innovative water treatment chemicals to optimize the water treatment in the hotels' chillers and cooling towers;
- washing only full loads of laundry in the washing machine;
- running the dishwasher only when it is completely full;
- using a pool cover in our outdoor swimming pool.

During the Reporting Period, there is no significant issue in sourcing water. Operating staffs continued to monitor the water data closely to enable us to address any leakage and inefficient use of water. We established a standard for water sub meters, in which the meter reading can provide a more detailed view of water consumption and earlier information for leak detection, and monthly sub-meter readings for the refilling facility.

In case there is any irregular consumption of water found, the specified team, will investigate and report the result to the management.

Waste

The management of the Group strives to manage our waste in a proper way and seeks to recycle used paper. Policies are in place to guide the employees on the disposal of hazardous waste. Any improper disposal of hazardous waste is subjected to investigation. Penalty may be imposed for any serious violation of the internal guideline.

We strive to reduce our hazardous and non-hazardous waste wherever possible through reuse or donations such as donation of used soap. We continued to work collaboratively with our recycling partners to review our waste stream and reduce the tonnage of waste that must be transported to a landfill. The main natural resource that the Group consumed was paper. The management of the Group encouraged our employees to use both sides of paper to reduce the paper wastage and to operate in paperless manner. Moreover, the Group selected paper based packaging materials and requested our suppliers to provide us with the safe packaging products which comply with the relevant regulations such as Poison Prevention Packaging Act of 1970 of the USA.

Due to the business nature, the Group's operations do not involve packaging materials for finished products.

Social Sustainability

The Group continued to uphold “the Group’s spirit - Spirit to serve” - with the aim to fulfill our commitment to care the communities we live in. The management of the Group believes that continuing to invest in the community in which we operate creates value for our brand and business and at the same time generates positive impact on the wider community and environment at large.



Our Corporate citizenship program, which was developed for enhancing the relationships with our customers and employees, has grown from a strong tradition of philanthropy and charity to a strategy initiating and supporting community outreach programmes with developmental and sustainable outcomes. The programme enables the Group to engage our employees and their family members in delivering their passion and time to serve the community.



Giving our employees the opportunity to volunteer in their communities fosters a sense of greater purpose and instills a deeper level of friendliness, which translates into a richer guest experience.

The events we organized for our employees during the year 2018:

- Celebration of Associate of the Month;
- Monthly Birthday and Anniversary Celebrations;
- Christmas party;
- Food donation event for Thanksgiving;
- Blood donation event, etc.

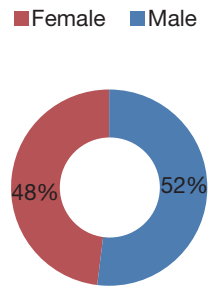


Employment

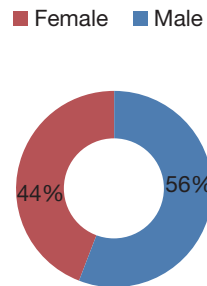
Harmonious workplace is essential to attracting and retaining talented employee and is an important element to increase the sense of belonging in the Group. Our human resource policies and initiatives are geared towards cultivating a caring, fair and inclusive workplace. It aims to foster well-being of our employees driving their satisfaction. Through proactive engagement by providing equal opportunities for promotion, supporting their lives and welfare and creating opportunities to make a contribution to the society.

As at 31 December 2018, the Group had a total of 148 employees (2017: 148 employees). The management of the Group places high emphasis on the diversity of our employees that allows us to connect with our customers efficiently. The following diagrams show the percentage of employees by gender for the year 2018 and 2017 respectively:

Gender 2018

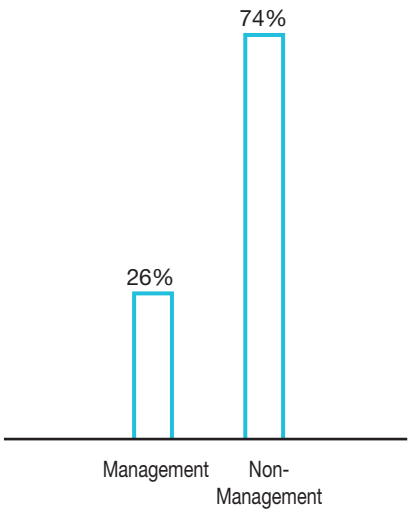


Gender 2017

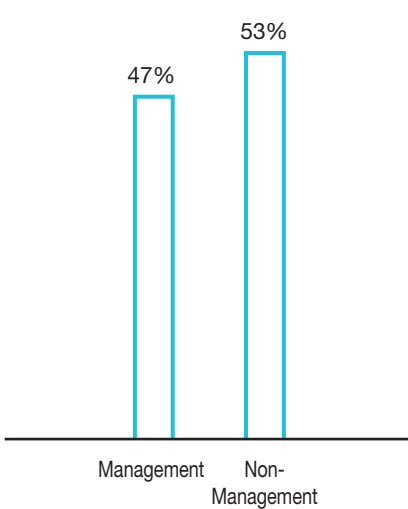


The following diagrams show the percentage of the employment type of the employee for the year 2018 and 2017 respectively:

Employment Type 2018

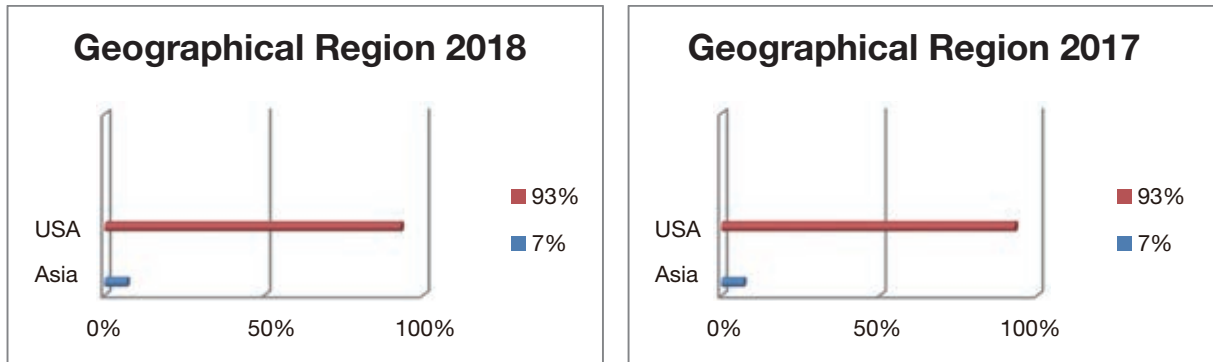


Employment Type 2017



Employment

The following diagrams show the percentage of employees by geographical region for the year 2018 and 2017 respectively:



The management of the Group reviewed the policies to ensure the Group complies with Fair Labour Standards Act and Employment Act of the USA and other relevant applicable laws and regulations relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination and other benefits and welfare.

The reward and compensation policies are in place offering promotional and career development opportunities to well qualified individuals within the Group. The compensation packages are reviewed periodically to ensure aligning with the market benchmark. The Group offers fair and competitive package based on the employee's performance and their expected role in the Group. A well-structured and appraisal system was developed to enable us to identify employees with high potentials.

Our Human Resources policy sets out the policy of employment termination. The compensation scheme of short notice dismissal was implemented to ensure we strictly comply with the relevant regulations.

Policies were adopted to monitor the employee's working hours and rest periods. Over time payment policy was reviewed by Human Resources Department to ensure that the employees are able to get their over time payment in accordance with the relevant applicable laws and regulations.

Policies were imposed to ensure that the Group complies with Fair Employment Act of the USA. The employment practices and hiring procedures are reviewed during the Reporting Period to ensure that the practices are free from discrimination of applicant's race, color, religion, sex, national origin, marital status, sexual orientation, age, disability or any other characteristic. All applicants should be pre-screened according to guidelines established for each open position. These guidelines will consist of application and/or resume review of work history in comparison to minimum position criteria. Employment interviews are arranged in an objective process. Training programs were provided for the interviewer aiming at increasing the employment skill and the successful rate of employment.

We encourage employing people from the local community and providing opportunity for upward mobility for people with disabilities. Policies, prohibiting discrimination against any applicant or fellow employee on the basis of a disability, were reviewed during the Reporting Period. The policies were imposed to ensure that the Group complies with Employment Non-Discrimination Act and Civil Right Act of the USA. We maintained different reporting channel for reporting any discrimination case, which is part of our Whistle Blowing Policy.

Health and Safety

It is of the utmost importance that we ensure our working places are safe and healthy for our customers and our employees. Besides the workplace health and safety, the management of the Group also places great emphasis on employee's well being.



The program -"AboutME", which promotes the concept "work-life balance", was designed for caring our employees in terms of their health, wellness and continuing education, providing other support services and providing support whenever possible. The program offers a variety of programs such as stress management, smoking cessation program and weight management, etc.

As we care about the health of the employees, we offer different types of insurance plans including but not limited to life, medical, dental and disability insurance for our employees. The disability insurance provides partial income benefits to employees of serious illness or injury which leads to total disability. The Company offers confidential and voluntary assistance to the employees who struggle in living.

The Department Head of the Group arranged exercise time regularly to do the pre-shift exercise with the employees. We also provide comfortable lounges where our colleagues can take rest during breaks. We promote a smoke-free working environment whereby all workplaces are required to provide separate, designated smoking areas for use by employees. The indoor air quality and ventilation systems is one of the areas we put emphasis on. We conducted indoor air quality measurement regularly to ensure the air quality.

In addition to caring the health of our employees, we are committed to providing a safety environment for our employees. Policies were implemented to ensure that the middle level management of the Business Units reports annually to the management of the Group regarding control measures for identifying any risks in respect of fire and electricity. All of the employees are requested to participate in regular emergency evacuation drills ensuring that they can manage any safety risks arising from emergency situation. During the Reporting Period, the Group did not recognise any non-compliance with the relevant laws and regulations that have a significant impact on the Group relating to providing a safe working environment and protecting employees from occupational hazards.

Our Safety and Security Committee reviewed the safety and education programs for our hotel and workplaces during the Reporting Period. Safety programs for all employees are intended to identify and correct potential hazards as well as to provide ongoing education and training in respect of safe working habits. The Safety and Security Committee continuously monitor that the policies adopted by the Group were executed effectively which including but not limited to:

- Reviewing our safety policies adopted that can fulfill the requirements in the Occupational Safety and Health Act of 1970 of the USA ("OSHA");
- Providing overall guidance and direction for the Group's safety and loss control program;
- Evaluating, analyzing and correcting safety and security problems;
- Monitoring inspection reports to ensure corrective action is taken;
- Promoting and implementing safety awareness and training programs for employees;
- Evaluating new and existing facilities, equipment and procedures related to safety and security; and
- Maintaining accurate and complete meeting and activity records and reports.

Health and Safety

The Group's approved provider of Management Food Safety Training is the Training Achievement Program Series (TAP). TAP provides easy access for management associates to receive online Food Safety Training. Anyone who satisfies the requirements of the Group's quality assurance audit will be awarded a qualification provided by the National Registry of Food Safety Professionals (NRFSP). Besides, the Group's proprietary program "Great Food Safe Food" is compulsory for every non-management food handler prior to preparing food or operating food preparation machinery.

We strive to enhance the injury and illness prevention through more robust post-incident investigations. We implemented Safety Rule which sets out the guideline of working in a safety way. In case any employee is injured in workplace, the employees must report the injury case to their supervisor. We maintain all OSHA records for five years. All recordable injuries were recorded onto the OSHA log as quickly as possible after the occurrence.

We recorded a total of 7 lost work days and there were no work-related fatalities.

Development and Training

The management of the Group strives to enhance the value of the employee and achieve their full potential through providing different kinds of training. We encourage our employee to obtain qualification relating to their work through the incentive program which provides subsidies for the employee. In addition, self development will be considered as one of the promotion factors in the appraisal.

We promote “The Spirit of Care” through the training programs for each level of employees concerning how their behavior conveys our promise to care for others. We continually convey and seek to model “The Spirit of Care” to our employees to put into practice the sincerity and depth of our values and to inspire our employees to help us demonstrate these principles.

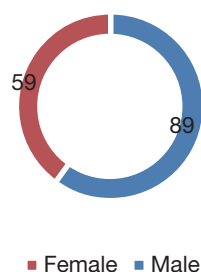
Leadership program is designed for all of the management level employees aiming to enhance their management skills. During the Reporting Period, all of the middle level management employees received training related to leadership development and technical training. Compulsory training programs are implemented for all front line employees providing the information related to soft skills and industry regulations. Trainings were provided before employees assume their responsibility and perform their job duties.

Other training programs were arranged including but not limited to the following:

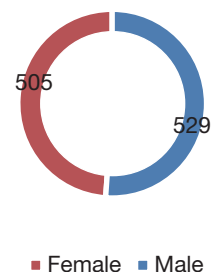
- Safe Lifting and Back Safety
- General Facility Housekeeping
- Fire Safety and Evacuation
- OSHA/Accident Prevention

The following diagrams demonstrate the training hours completed per employee by gender for the year 2018 and 2017 respectively:

Training hours by gender in 2018



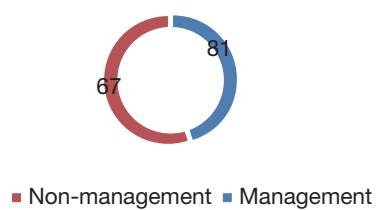
Training hours by gender in 2017



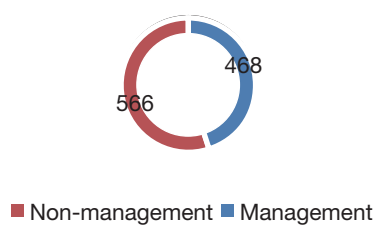
Development and Training

The following diagrams demonstrate the training hours completed per employee by employee category for the year 2018 and 2017 respectively:

**Training hours by
employee type in 2018**



**Training hours by
employee type in 2017**



Labour Standards

Policies implemented for the compliance with the Fair Labor Standards Act and Child Labor Laws of the USA and other relevant laws and regulations that have a significant impact on the Group relating to preventing child and forced labour were reviewed by the management of the Group during the Reporting Period. Working hours, compensation for overtime and scope of duties are clearly stated in the employment contract signed before an employee reports to work. We denounce all forms of child exploitation, forced or bonded labour and recognizing the right of workers. An independent whistle blowing channel was set up allowing anyone to raise concerns and seek guidance on a broad range of issues.

Immediate action will be taken including but not limited to cessation of employment, reporting to relevant regulators and forming an independent committee to investigate the case related to forced labour practice and child labour employment. Neither child labor employment nor forced labour practice was found during the Reporting Period.

Supply Chain Management

Our suppliers are acting as our partner working together to pursue our goals. We are aware that the procurement practice implemented by the Group will affect the reputation of the Group. Therefore, we embedded sustainability considerations into our procurement process.

The procurement conduct guide specifying the requirement of selecting the suppliers was reviewed by the management of the Group during the Reporting Period. We expect the supplier partners to follow the guidelines as outlined below:

- Respecting the principles of human rights;
- Complying with all applicable local and national labor laws especially in relation to discrimination, minimum wage, overtime and maximum working hours;
- Ensure all work is out of one's volition and workers should be free to terminate employment with reasonable notice;
- Complying with applicable labor law, in particular in connection with child labor;
- Upholding a safe and healthy work environment;
- Minimizing the impact of their operations on the environment and obtaining all necessary environmental permits and registrations;
- Following all applicable laws regarding prohibition of specific substances and/or ingredients and regulations for handling, recycling and disposal of all waste types;
- Undertaking ongoing efforts to reduce their operational impact on the environment.

Preference will be given to the suppliers:

- Indicating preference for use of eco-friendly recycled materials and products;
- Indicating preference for ISO 14001 certified vendors;
- Declaring the use of eco-friendly/recycled paper unprinted materials.

We worked closely with one of the largest professional procurement companies serving the hospitality industry in the USA, to source most of the food and beverage and facilities. We prioritised to purchase environmentally friendly products such as "room-ready" towels, recycled material pens, low VOC paint, biodegradable laundry bags, low-energy light bulbs and coreless toilet paper. Due diligence was performed in the process of selecting a new supplier through collecting information by questionnaires and performing site visit. Yearly review of the existing suppliers was performed during the Reporting Period to ensure our suppliers strictly followed our procurement conduct guide.

Product Responsibility

The management of the Group strives to make responsible choices to create luxurious experiences for our guests. We place great emphasis on providing high quality services and products to meet the customer's expectation.

We gathered customer's feedback through our interactions with optional survey available in hotel room. Mystery guest program was launched to observe the service quality provided by the front line employees. Monthly regular meeting is compulsory for collecting information gathered by the front line employees from the daily operation. In case there is any negative response gathered from our customers, the management of the Group will analyze the cause and will take follow-up actions accordingly.

The management of the Group place great emphasis on managing the negative impact of customers' complaints. Policies and mechanism of complaint handling was reviewed during the Reporting Period. A specific hotline was set up for receiving complaints made by our guests and customer. All of the employees are requested to handle the complaints in accordance with the internal guidelines. The Group did not receive any complaint nor recall of services and products during the Reporting Period. Policies are in place to deal with the product or service recalls such as offering compensation coupon, refund of deposit and etc.

Moreover, policies imposed to ensure the compliance of the Product and Safety Act of the USA, such as strict selection of suppliers, procuring the reputable products which comply with the related legislation of safety, were reviewed. In order to maintain a high level food quality and support the local communities, we developed a procurement guide outlining the procurement principles and suggesting alternatives for a variety of raw materials. Our procurement policies requested that the products provided were properly labeled.

We provide Management Food Safety Training which is Training Achievement Program Series ("TAP"). TAP provides easy access for employees to receive online food safety training, and provides senior employees with Food Safety Certification resources and instructions.

Policies were in place for the Group to ensure the compliance of Little FTC Acts of the USA for our marketing activities. During the Reporting Period, we do not recognize any non-compliance with laws and regulations of marketing and advertising practices.

During the Reporting Period, we did not recognise any non-compliance with relevant laws and regulations that have a significant impact on the Group relating to health and safety, advertising, labelling and privacy matters relating to products and services provided and methods of redress.

Privacy policy

The Group is committed to protecting the privacy of all individuals. We imposed strict procedures in dealing with collecting, retaining, and disclosing personal information, and the management of the Group also avoids inappropriate or unnecessary disclosures of information to ensure the compliance of the Privacy Act of the USA.

We set up the qualified security system in accordance with the standard of international information technology security system. Annual review was performed for the security system to evaluate the compliance of our internal guideline.

Policies are in place to ensure the proper use of personal information. The personal data is only allowed to be stored for the period of time permitted by relevant laws in the jurisdiction of the operation holding the information. Policies were implemented to keep the sensitive information protected. An authorized employee who is eligible to access confidential information is requested to sign the non-disclosure agreement. We maintained administrative, technical and physical safeguards designed to protect the personal data we maintain against unauthorized use.

Product Responsibility

Intellectual property rights

The policies for protecting the intellectual property rights were reviewed during the Reporting Period including but not limited to:

- maintaining an effective system of Internet Protocol asset management, including maintaining an inventory and records of IP-related assets and agreements;
- Prohibiting the infringement of a third party's intellectual property rights in its products and services; and
- Prohibiting the use of counterfeit or other infringing goods and services.

The effectiveness of the policies was measured through internal audit review. We did not discover any infringement of intellectual property rights during the Reporting Period.

Anti-Corruption

We are committed to operating with integrity and complying with all relevant anti-corruption regulations. All employees are responsible to ensure the highest standard of ethics in alignment with our commitment. Our business conduct guide sets out the policies to deal with the issues related to antitrust, unfair competition, political contributions, abuse of purchasing power, commercial and political bribery. Our Anti-Bribery and Corruption Policy clearly specifies the meaning of bribery and corruption and our position on facilitation payments and gifts.

Specific training program was designed to educate our employees about the importance of anti-bribery and corruption practice. The training programs introduce the relevant regulations in relation to anti-bribery and corruption. All of the employees are required to receive training including face-to-face training to ensure our employees recognize and avoid any potential instances of corruption.

Whistle Blowing Policy

The whistle blowing policy was reviewed by the management of the Group during the Reporting Period. The launch of the policy aims to set up a reporting channel for all parties to raise concerns, in confidence, about misconduct, malpractice, impropriety, statutory non-compliance or wrongdoing by staff in the course of their work in any language. The policy builds up a framework to promote responsible and secure whistle blowing without fear of adverse consequences. Our objectives include but not limited to:

- encourage timely report of any misconduct;
- respond timely to such misconduct;
- serve as a means of avoiding misconduct; and
- promote a culture of integrity.

Policies were imposed to ensure the Group to comply with the Money Laundering Control Act of 1986 and the US Foreign Corrupt Practices Act 1977 of the USA and relevant laws and regulations that have a significant impact on the Group in relation to bribery, extortion, fraud and money laundering. The whistle blowing policies were posted on employee notice boards and the intranet for transparency and ease of access by employees. The whistle blowing policies were included in the training material for all new employees.

For the Reporting Period, there is no legal case regarding corruption, bribery, extortion, fraud and money laundering practice brought against the Group and our employees.

Anti-Corruption

Conflict of Interest

The guidelines on conflict of interest were established and implemented for the avoidance of conflict of interest between employees and the Group. The management of the Group requests every employee strictly comply with the rules in all respects with the various federal and state antitrust laws of the USA that affect the hospitality industry. All of the employees work in management level are required to submit a Conflict of Interest Questionnaire and Confirmation letter to disclose any potential conflict of interest.

According to the Code of Conduct implemented by the Group, each of the employees should act in good faith to perform their duties especially when they are dealing with external parties. Identifying and managing conflict of interest supports employees in demonstrating impartiality and integrity when executing their duties. To ensure that the conflict of interest are identified and managed, the Group provides training programs for all of the employees working in management level. For an employee who becomes involved in a situation where his or her personal interest is perceived to be in conflict with that of the Group, it is imperative that he or she discloses the existence of any actual or potential conflict of interest by completing and forwarding the Standards of Conduct Agreement to our Human Resources department as soon as possible so that safeguards can be established to protect all parties.

Once the conflict of interest has been identified, the management will perform the following procedure in accordance with the guideline including but not limited to:

- withdrawing the employee from the situation leading to conflict;
- prohibiting the employee from further involvement in the transaction; and
- considering remedies to reduce the impact.

Any inside business information of the Group should be kept in confidence and are prohibited to be disclosed to outsiders. Accepting gifts, favors or entertainment should be disclosed in accordance with the guideline set out in Anti-Bribery and Corruption Policy. Any employee who violates the Policy will be subject to disciplinary action or even possible termination of employment and legal action.

