



FORTRESS MINERALS LIMITED

ANTI-BRIBERY AND CORRUPTION POLICY

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FORTRESS MINERALS LIMITED ANTI-BRIBERY AND CORRUPTION POLICY

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OBJECTIVE

The objective of this Anti-Bribery and Corruption Policy (“ABC Policy” and / or “this Policy”) is to set out Fortress Minerals Limited (“Fortress” or “the Company”) and its subsidiaries’ (collectively known as “the Group”) responsibilities to comply with laws and regulations in relation to bribery and corruption. This Policy aims to provide guidance on how to recognise and deal with bribery and corruption issues, so as to ensure that the Group’s businesses are conducted in a socially ethical manner.

POLICY STATEMENT

The Group is committed to apply the highest standards of ethical conduct, integrity and accountability in all our business activities and operations. The Group adopts zero-tolerance approach towards any form of bribery and corruption by, or of, its employees or any persons or companies acting for or on behalf of the Group. The Group has put in place this Policy that will elaborate on these principles, by providing guidance to all Employees with regards to dealing with any improper solicitation, bribery and other corrupt activities and issues that may arise in the course of doing business.

Special consideration

It is important that in addition of comply with the Group’s Code of conduct, Malaysia entities shall also comply with the provisions in accordance to the laws of the Guidelines on Adequate Procedures pursuant to Subsection (5) of Section 17A under the Malaysian Anti-Corruption Commission Act 2009.

APPLICATION

This Policy is applicable to the Directors, Employees and Business Associates engaged in performing work or services for or on behalf of the Group.

The Group considers that the rules set out in this Policy represent good business ethical practices that transcend national boundaries. Should local regulations be less restrictive than the provisions in this Policy, the Anti-Bribery and Corruption Policy shall prevail. If local regulations however are more restrictive than the provisions in this Policy, the more restrictive local regulations shall prevail.

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DEFINITIONS

Abbreviation	Description
ABMS	Refers to the Group's Anti-Bribery Management System.
ABC Policy	Refers to the Anti-Bribery and Corruption Policy.
Bribery	Refers to the act of offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties.
Board	Board of Directors (executive or non-executive) of the Group.
Business Associates	Refers to any individual or organisation come into contact with during the course of work, which includes actual and potential customers, agents, contractors, sub-contractors, dealers, suppliers, joint venture partners, government and public bodies, including their advisors, representatives and officials, politicians and political parties.
Corruption	Refers to the abuse of entrusted power for private gain.
Directors	Refers to executive or non-executive, including the Board.
Donation	Refers to voluntary contributions in the form of money or goods which are made for charitable purposes.
Employees	Refers to anyone who is employed by or work at Fortress (whether permanent, fixed-term or temporary basis).
Entertainment and Hospitality	Comprises of expenses incurred for provision of food, drink, travel, accommodation or recreation of any kind, by a party to another party.
Facilitation Payment	Refers to the definition provided by <i>Transparency International</i> , which is a small bribe, also called a 'facilitating', 'speed', or 'grease' payment, made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.
Fortress or the Group	Fortress Minerals Limited or Fortress Minerals Limited and its subsidiaries.
Foreign Public Official	Refers to the definition provided in MACC Act 2009: <ul style="list-style-type: none"> ▪ any person who holds a legislative, executive, administrative or judicial office of a foreign country whether appointed or elected; ▪ any person who exercises a public function for a foreign country, including a person employed by a board, commission, corporation, or other body or authority that is established to perform a duty or function on behalf of the foreign country; and ▪ any person who is authorized by a public international organization to act on behalf of that organization.

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Abbreviation	Description
Gifts	In the form of cash and non-cash, free fares, shares, lottery tickets, club membership, hampers, jewellery, decorative items and any items or valuable consideration of any kind that is given by a party to another party.
Management	Refers to Directors or Employees in supervisory roles.
Officer of a Public Body	Refers to the definition provided in MACC Act 2009 that any person who is a member, an officer, an employee or a servant of a public body, and includes a member of the administration, a member of Parliament, a member of a State Legislative Assembly, a judge of the High Court, Court of Appeal or Federal Court, and any person receiving any remuneration from public funds, and, where the public body is a corporation sole, includes the person who is incorporated as such.
Red Flags	Refers to the indications or evidence of possible violations of the Group's ABC Policy and Procedures such as unusual or suspicious transactions, unexplained invoices, incomplete information and receiving of gifts and hospitality.
Sponsorship	Supporting people, organisations or events through money, goods or services with the purpose of promoting one's own communication and marketing objectives. The objective of sponsorship is to raise awareness about one's own company.

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REFERENCES

This Policy should be read in conjunction with the Group's relevant internal operational standard operating procedures as well as the Group's policies & guidelines as follows;

Location	Policies and Guidelines
Publicly Available	Code of Ethics
	Whistleblowing Policy
Internal Document	Corruption Risk Assessment Policy
	Guideline on Declaration of Interest
	Guideline on Providing and Receiving of Gifts, Entertainment and Hospitality
	Guideline on Granting of Donations and Sponsorships
	Guideline on Due Diligence on Employees and Business Associates
	Guideline on Raising a Concern
	Guideline on Training and Communication
	Anti-Bribery and Corruption Code of Conduct

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RESPONSIBILITY

In driving the Group towards upholding its anti-bribery stance, the Management, Employees and Business Associates are responsible to establish and foster an ethical business culture to ensure the bribery risk is managed. The key responsibilities are set out as follows:

Personnel Involved	Key Responsibilities
Management	<ul style="list-style-type: none"> ▪ Uphold the highest ethical standards of business conduct. ▪ Encourage ethical decision-making and rewarding integrity. ▪ Be a role model and lead by example. ▪ Ensure that Employees are given the opportunity and guidance to understand the ABC Policy and other applicable policies. ▪ Create a positive and transparent environment where Employees are comfortable raising questions and concerns. ▪ Ensure those who raise genuine concerns do not suffer retaliation.
Employees	<ul style="list-style-type: none"> ▪ Familiarise and comply with the Group's ABC Policy and other applicable policies. ▪ Annual acknowledgement of ABC compliance and attend regular ABC training. ▪ Assist Business Associates to understand the practicality of the Group's ABC Policy. ▪ Raise questions and voice concerns in cases when there is a suspected violation of laws or internal policies. ▪ Pressure or demands due to business conditions are never an excuse for operating outside the law or behaving inconsistent to the Group's policies and values.
Business Associates	<ul style="list-style-type: none"> ▪ Adhere to and act in the same way that is consistent with the Group's anti-bribery stance, Policy and other policies related to the anti-bribery's measures.

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TOP LEVEL COMMITMENT

The Board is primarily responsible for ensuring that the Group effectively manages its key corruption risks. This includes establishing the Group's "tone from the top" (i.e. the Group's general stance against the use of corrupt practices in relation to its business activities), and spearheading the Group's efforts to improve the effectiveness of its corruption risks management framework, internal control system, review and monitoring, and training and communication. A Compliance Manager is assigned to be responsible for all anti-bribery and corruption compliance matters, including provision of advice and guidance to Employees and Business Associates in relation to the Group's ABC Policy.

UNDERSTANDING CORRUPTION

Corruption relates to the offer, promise, donation, acceptance or solicitation of an undue advantage of any value (financial or non-financial), directly or indirectly, wherever the location, in violation of applicable laws, to encourage or reward a person for acting or not acting within the scope of his / her functions.

An act of corruption may be active or passive, be committed by or with Officer of a Public Body or private individuals, directly by a company Manager or Employees or via an intermediary appointed by the Group. Further details are provided below.

Direct / Indirect Corruption

Direct corruption happens when the act is directly committed by the person looking for a favour. In this case, this is a direct exchange between the corrupting party and the corrupt person.

Indirect corruption is when the act is committed by an intermediary appointed by the Group on behalf of the person benefiting from the undue advantage, including if the beneficiary of the advantage is unaware that an act of corruption has been committed.

Both types of corruption are strictly prohibited. A company may be prosecuted for indirect corruption, even if it was unaware of the acts of corruption committed by the intermediary appointed by the Group. It is essential to ensure that intermediaries that represent the Group are selected carefully, and undertake to comply with the Fortress's Anti-Bribery and Corruption Code of Conduct.

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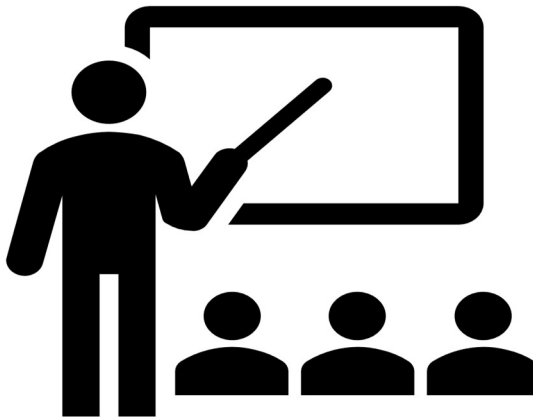
WHAT IS BRIBERY?

Bribery is defined as:

- i. **Promises, offers or gifts of “anything of value”** (financial or non-financial), whether directly or indirectly, with the intention to induce or reward a person to act or refrain from acting in relation to the performance of that person’s duty; or
- ii. **Requests, agrees to receive or accepts “anything of value”** (financial or non- financial), whether directly or indirectly, with the intention to induce improper performance in relation to the person’s duty.

What constitute “Anything of Value”?

The Anti-Bribery and Corruption laws and regulations prohibit the giving or receiving of “anything of value” in order to obtain or retain business, or receiving / providing an undue advantage in the conduct of business, which includes, but are not limited to, the following:



- Financial value - cash and cash equivalent (i.e. stocks, bonds, equities, discounts, gift vouchers, loans, advances).
- Extravagant hospitality, gifts or entertainment (i.e. luxury holidays/travels received from a supplier).
- Contracts or business opportunities (i.e. promising and offering contractual business opportunities to Business Associates without going through the appropriate processes).

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CORRUPTION RISK ASSESSMENT

The Board believe that the Group's risk assessment must be effective and embedded at all levels of the organisation to intermittently assess corruption risks when necessary, i.e. an annual risk assessment on corruption risk, and other reasonable cause for suspicion, i.e. upon:

- opportunity corruption and fraud activities arising from weaknesses in the organisation's governance framework;
- suspicious financial transactions indicating disguised corrupt payments;
- presence of business activities in countries / sectors with high corruption risk;
- significant change in the business landscape; and
- potential non-compliance of Business Associates acting on behalf of Fortress with regards to legal and regulatory requirements related to anti-corruption.

The risk assessment must identify internal and external sources of information which will assist in categorising the bribery and corruption risks to the Group. Details of the corruption risk assessment framework are established and outlined in Fortress's ***Corruption Risk Management Policy*** for continuous adherence.

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FACILITATION PAYMENTS

Facilitation payments are typically small payments made to secure or expedite the performance of a routine or necessary action to which the payer is entitled, legally or otherwise (i.e. influencing the timing of process or issuing of permits). In Malaysia, facilitation payment is illegal. It is seen as a form of bribery. Facilitation payments are strictly prohibited under this Policy regardless whether it is legal in any other country,

Our Employees and Business Associates must not directly or indirectly offer, promise or give any form of facilitation payments to any Officer of a Public Body for any purposes. However, there is certain exceptional situation or circumstances where he / she is faced with having to make facilitation payment, in order to protect his / her life, limb or liberty. In this dangerous situation, he / she is allowed to make payment and must immediately report to the Board of Director. Making facilitation payment in such a situation is the only exception which can be used as a defence when faced with allegations of bribery and corruption.

Dealing with Facilitation Payment

Differentiating between a legitimate request for payment in exchange for a service, and an illegal request for a bribe can be difficult. If you face this problem, stop and ask yourself these questions:



1. Am I able to obtain an **official receipt** for the payment?
2. Am I being **pressured** to make the payment?

If you are not able to obtain an official receipt or felt pressured into making a payment, the representative may be asking you for a facilitation payment.

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CONFLICT OF INTERESTS

Conflict of interests arise when the various interests, duties or commitments that a person may have, family, friends, work, voluntary work or political interests, come into conflict (or are very likely to). A conflict of interest do not necessarily involve improper or corrupt behaviour, although it can lead to it. It is best practice for the company to be transparent about its policies and operations to avoid risk of public suspicion of conflicts of interest. Generally, weak identification and management of conflicts of interest will undermine the company's reputation for integrity.

One should avoid situations and positions where personal relationship (i.e. family member, friend) and / or personal benefit will influence and impair his / her ability in performing the professional obligations and responsibilities at Fortress.

A possible conflict of interest may arise when a person:

- Has a financial interest and possess controlling rights in a supplier, competitor or customer when the person is involved in the Group's decision making relating to, or of relevance, to the supplier, competitor or customer;
- Engages in activities that compete with, or perceived to compete with Fortress's interest; or
- Allows business decisions to be influenced, or appear to be influenced, by personal or family interests.

Any actual or potential conflicts of interest are to be fully disclosed to the Management and / or the Board. When such circumstances are permitted by the Management and / or the Board to continue, it shall not be deemed as breach of this Policy.

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GIFTS, ENTERTAINMENT AND HOSPITALITY

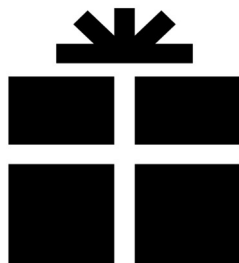
Gift Policy

The Group has adopted a “No Gift” Policy and it is applicable to its Employees and Directors. The Group’s Directors and Employees, family members or intermediaries acting for or on behalf of the Directors, Employees, or their family members are prohibited from, directly or indirectly, receiving or providing gifts.

The Group requires all Directors and Employees to abide by this Policy to avoid conflict of interest or the appearance of conflict of interest for either party in an on-going or potential business dealing between the Group and external parties as a gift can be seen as a bribe that may tarnish the Group’s reputation or be in violation of anti-bribery and corruption laws.

It is the responsibility of Directors and Employees to inform its Business Associates or external parties involved in any business dealings that the Group practices a “No Gift” Policy and request for their understanding for adherence with this Policy.

There are certain exceptions to the general rule whereby the receiving and provision of gifts are permitted in the following situations:



- Token gifts of nominal value normally bearing the company’s logo that are given out equally to attendees during company function, event and celebration and deemed as part of the company’s brand building or promotional activities;
- Festive or ceremonial gifts of appropriate value during festive seasons or other ceremonial occasions; when refusing the gift is likely to offend and harm the business relationship with the giver; or
- Gifts given during invitation to speak at conferences or work-related conferences.

The intention behind the gift should always be considered and nothing should be specifically expected or demanded in return.

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Corporate Entertainment and Hospitality

Corporate entertainment and hospitality is generally defined as “corporate events or activities organised by an organisation which involves the entertainment of Directors, Employees and Business Associates for the benefit of that organisation”.

The Group recognises that the occasional acceptance / provision of an appropriate level of hospitality given in the normal course of business is usually a legitimate contribution to building good business relationships. However, it is important for all Directors and Employees to exercise proper care and judgement before accepting / providing the entertainment and hospitality. This is not only to safeguard the Group’s reputation, but also to protect the Directors and Employees from allegations of impropriety or undue influence.

The acceptance / provision of corporate hospitality (other than refreshments offered in meetings held at business premises) requires prior approval from the CEO / Board of Director. The Directors and Employees should only accept corporate hospitality if it is ethically, morally and socially proper. If hospitality has as intent or purpose is to attempt to secure a business advantage or influence a decision (i.e. by creating a sense of obligation) then it must be declined politely.

In cases where the Employees or Directors have any doubts on the appropriateness of a corporate hospitality offered by an external party, they should either decline the offer or consult with Financial Controller.

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CHARITABLE CONTRIBUTIONS AND SPONSORSHIPS

Corporate social responsibilities, sponsorships and / or donations must not be a disguise of bribery or conduit to fund illegal activities, which are in violation to the Group's policies and procedures, and the applicable laws and regulations.

Good judgement has to be exercised in assessing the request of sponsorships or donations. The Group must be certain of the intent and purpose of any donations or sponsorships given.

Any charitable contribution, sponsorships and corporate social responsibility activities should be reviewed by Financial Controller. The Group will conduct a due diligence exercise to ensure that the recipient of any charitable contribution or sponsorship is a legitimate and, in the case of a charity (if required under local laws) registered charity.

The activities must be accurately stated and documented in the Group's accounting books and records. When in doubt, the Employees should seek further advice from the Finance Controller.

The recipient will be required to provide a receipt for the contribution, and confirmation of what the funds will be used for.

POLITICAL DONATIONS

The Group does not make charitable donation or sponsorship to any political association or parties.

In undertaking any such unauthorised activity, all Employees will be deemed to be acting in their personal capacity or that of their own corporate organisation and not on behalf of the Group.

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DUE DILIGENCE

Due Diligence for Business Associates

The purpose of carrying out the due diligence procedures are to serve as a guide to the Employees in making a decision whether to on-board / continue the relationship with any Business Associates.

The Group's dealings with Business Associates must be carried out in compliance with all relevant laws, consistent with the values and principles of the Group's Code of Ethics and Conduct. As part of this commitment, all forms of bribery and corruption are unacceptable and will not be tolerated.

The Employees are to carry out proper due diligence process and comply with all applicable standard operating procedures before on-boarding any Business Associates. This include informing them of the Group's Anti-Bribery and Corruption Policy. With effect from the date of this policy, all Business Associates are to complete and submit a ***Business Associates Declaration Form*** prior to being approved as the Group's service providers.

Internal Due Diligence for Recruitment

The recruitment of Employees should be based on an approved selection criterion to ensure that only the qualified and suitable individuals are employed. This is crucial to ensure no element of corruption is involved in the hiring of Employees.

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FINANCIAL AND NON-FINANCIAL CONTROLS

The Group adopts clear separation of duties for all jobs' functions (i.e. financial and non-financial related) within the Group. The designated Employees are assigned to prepare, verify and approve each transaction / activity in accordance with the written procedures (i.e. Accounting Policies and Procedures and Approved Authority Limit). The procedures are communicated to all Employees for compliance and adherence.

For non-financial related activities, there must be at least two-layers of checking i.e. maker and checker. Nonetheless, in most circumstances, the non-financial related functions will have three layers of checking.

For financial related activities, the Group adopts three layers of checking comprises of the maker, checker and approver. For disbursements and payments, the Group strictly adopts multiple signatories to further mitigate any bribery risk.

RECORD-KEEPING AND DOCUMENTATIONS

The Group's respective Divisions / Departments must retain all records, operational work documents, other documents, and transactions for at least seven (7) years to enable the Group to comply with any requests from the relevant authorities.

It is the Group's goal to maintain accurate and precise records in order to be transparent. The Group will ensure that we will not: -

- Falsify, omit, misstate, alter or conceal any information or otherwise misrepresent the facts on a company record;
- Encourage or allow anyone else to compromise the accuracy and integrity of the records;
- Intentionally make a false or misleading entry in a record, report, file or claim; and
- Engage in any scheme to defraud anyone.

All financial books and records must accurately reflect and disclose the business rationale, purpose, substance and legality of all our local and cross-border transactions, payments and expenses, gifts, entertainment and hospitality received or given to the Group's Directors and Employees.

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RAISING A CONCERN

All Employees have the responsibility for helping to detect, prevent and report instances of bribery and any other suspicious activity or wrongdoing. The Group is absolutely committed to ensure a safe, reliable and confidential way of reporting any suspicious activity.

In cases where an Employee suspects, or reasonably believes that this Policy has been, or is being breached, he / she has an obligation to report his / her concerns through the designated reporting channels set out in the Group's **Whistleblowing Policy** which is available on the Group's corporate website.

All concerns reported will be taken seriously, treated in confidential manner and investigated immediately.

The whistleblower's anonymity will be protected unless the disclosure is required by law pursuant to an investigation or legislation. Any retaliation directed against anyone making such report will not be tolerated.

All reports shall be made in good faith and the report must be legitimate. Anyone who makes any malicious, scandalous or vexatious report, and particularly if they persist with such untrue allegations, they will be subjected to the Group's disciplinary actions.

TRAINING AND COMMUNICATION

This Policy is a public document which will be communicated to all Employees and Business Associates. Our Employees and Business Associates are to read and understand the Group's position on anti-bribery and anti-corruption.

Training on this Policy forms part of the induction process for all new Employees. All existing Employees will receive regular, relevant training on how to implement and adhere to this Policy.

The Group acts with due care prior to engaging with new Business Associates and ensures that they acknowledge the Group's commitment on prohibiting bribery / corruption activities.

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MONITORING AND REVIEW

The Group's Compliance Manager, i.e. Financial Controller will monitor the effectiveness and review the implementation of this Policy regularly considering its suitability, adequacy and effectiveness.

Regular audits to be conducted to monitor, review, improve and assess performance, efficiency and effectiveness of ongoing anti-bribery and anti-corruption efforts by the Group. Such audits may be conducted internally by the Group or by an external consultant. The results of any audit, risk assessment, review of control measures and performance shall be reported to the Audit & Risk Committee and acted upon accordingly.

All Employees are responsible for the success of this Policy and should ensure they use it to disclose any suspected misconduct.

Our Employees is encouraged to raise any concerns or inadequacies in the anti-bribery and anti-corruption programme to the Compliance Manager.

This Policy will be reviewed annually and may be amended at any time. All Employees will be fully informed of any revisions to this Policy.

ENFORCEMENT FOR NON-COMPLIANCE

Non-compliance and violation of this ABC Policy may be subjected to disciplinary actions (i.e. reprimands, demotions, formal warnings, dismissal or termination of employment contract) and / or any legal proceedings.

The Group will have the right to exercise an audit or inspection on Business Associates who are alleged or reported to be in non-compliance with the Group's ABC Policy. In cases where any of the Group's Business Associates dealing with the Group are found to have breached of the ABC laws or regulations or the Group's ABC Policy, such breach may result in termination of contract(s) and if required, subject to legal proceedings.

-End of Policy-