



## Governance and Anti-Bribery & Corruption Policy 治理与反贿赂与反腐败政策

LQ Retail Sdn Bhd,  
LQ Residential 1 Sdn Bhd, LQ  
Residential 2 Sdn Bhd, LQ  
Residential 3 Sdn Bhd  
(collectively the “Company” or “Companies”)  
(统称“公司”)

Approver’s name and title:  
批准者姓名和职务

**Company Board of Directors**  
公司董事会

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生效日期

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## Policy Statement

### 政策声明

The Company's Board of Directors has zero-tolerance for bribery and corruption and is committed to conducting business in an ethical and honest manner, professionally and fairly with integrity and good governance in all of its business dealings and relationships.

公司董事会对贿赂和腐败行为采取零容忍态度，并致力于以道德和诚实的方式、专业和公平的方式开展业务，在所有商业往来和合作关系中保持诚信和善政。

This Governance Policy ("**Governance Policy**" or "**Policy**") explains the standards the Company expects in the conduct of its operations and sets out the responsibilities of those carrying out the Company's business or transacting with the Company in upholding the Company's zero-tolerance policy on bribery and corruption.

本治理政策（“治理政策”或“政策”）列明公司在商业经营中的标准，并规定了从事公司业务或与公司交易的人员的责任，全力维护公司对贿赂和腐败的零容忍政策。

This Policy has been approved by the Company's Board of Directors and applies to all directors, officers and employees (if any) of the Company.

本政策已获本公司董事会批准，适用于本公司所有董事、高级职员及雇员（如有）。



Suppliers, contractors, vendors and service providers (“**Service Providers**”) engaged by the Company and any third parties with whom the Company works with are expected to:-

与公司合作的供应商、承包商和服务供应商以及任何第三方聘用的单位（“服务供应商”）应该： -

- have read and understood this Policy;
- 已阅读并理解本政策；
  
- act consistently with the Policy in all their dealings with or in relation to the Company;
- 在与本公司或有关的所有交易中，均应遵守本政策；
  
- take reasonable steps to communicate this Policy to their employees, vendors, agents and third parties with whom they engage in carrying out work related to the Company.
- 采取合理措施，将本政策传达给执行与公司有关工作的员工、供应商、代理商和第三方。



## Code of Conduct 行为准则

<p><i>We must obey the law</i> 我们必须遵守法律</p>	<p><b>Standards of Conduct</b> 行为准则</p> <p>The Company is committed to complying with the laws and regulations of Malaysia. 公司承诺遵守马来西亚的法律法规。</p> <p>You must respect and obey the laws and regulations applicable to the Company in Malaysia. 您必须尊重并遵守适用于马来西亚公司的法律法规。</p> <p>Where local laws, regulations, customs or norms differ from this Policy, you must apply either this Policy or local requirements, whichever sets the higher standard of behaviour. 如果当地法律、法规、习俗或规范与本政策有出入，在取舍本政策或当地法规要求之间，以行为标准较高者为准。</p>
<p><i>We must hold those we transact with to the same standard</i> 我们必须确保任何交易保持相同标准</p>	<p><b>Contract Dealings</b> 合同处理标准</p> <p>The company refrains from conducting business with any third party suspected of wrongdoing, unless those suspicions have been investigated and resolved or otherwise approved by the Compliance Officer. 公司不与任何涉嫌不法行为的第三方开展业务，除非这些可疑的不法行为已被调查和解决或经合规专员的批准。</p> <p>Contractual arrangements between the Company and a third party shall be subject to terms that the third party agrees not to violate anti-corruption laws. Any violation may result in a termination of that contract. 公司与第三方之间的合同安排应建立于第三方同意不违反反腐败法的条款。任何违反行为都可能导致该合同被终止。</p>



Service providers should be selected based on merit (price, product, quality, service, delivery, reliability, technical ability and other supplier aspects) and in accordance with the TRX Lifestyle Quarter Procurement Policy.

服务供应商的遴选标准应根据其强项优势，譬如价格、产品、质量、服务、交付、可靠性、技术能力和其他优势以及符合 TRX Lifestyle Quarter 公司的采购政策。

Avoid preferential treatment based on individual preference, personal connections, inappropriate gifts and entertainment or any other kind of favouritism.

避免基于个人偏好、个人关系、不适当的礼物赠送和娱乐馈赠或任何其他形式的偏袒而给予特殊待遇。

<p><i>We must be aware of actual or potential conflicts of interest</i></p> <p>我们必须时刻警惕实际或潜在的利益冲突</p>	<p><b>Conflict of Interest</b> 利益冲突</p> <p>A “conflict of interest” is any circumstance where the personal interests of the Company’s directors, officers and/or employees conflict (or appear to conflict) with those of the Company, or cast doubt on their ability to act appropriately regarding the interests of the Company. This includes any situation that benefits the individual.</p> <p>“利益冲突”是指本公司董事、高级职员和/或雇员的个人利益与本公司的利益发生冲突（或潜在利益冲突），或在维护本公司利益时产生的可疑情况，这包括任何偏袒于其个人利益的情况。</p> <p>If such a situation arises, you must declare any such interest that may conflict or be perceived to conflict with the Company or may otherwise adversely affect the Company, by reporting the situation to the Compliance Officer.</p> <p>如果出现这种情况，您必须向合规专员报备任何可能与公司发生利益冲突或潜在利益冲突或可能对公司产生负面影响的利益冲突。</p> <p>Failure to disclose a conflict of interest may result in contractual sanction or disciplinary action. 任何隐瞒利益冲突将可能导致合同制裁或纪律处分。</p> <p>If you are unsure whether a potential conflict may or has arisen, or if you have any questions about conflict of interest issues, you should contact the assisting compliance officer. 如果您不确定是否可能或已经发生潜在利益冲突，或者您对利益冲突有任何疑问，请联系合规专员助理。</p>
<p><i>We must not make unauthorised gains or payments, or engage in corrupt conduct</i></p>	<p><b>Gifts and Entertainment</b> 礼物和娱乐</p>

我们不允许收取非法利益或从事舞弊行为

As a general rule, the Company's officers and employees must not give or receive anything of value such as gifts, entertainment, meals, services, discounts, gratuities or other gains (gifts and entertainment) if the purpose of the gift or entertainment is to obtain any improper advantage.

公司基本要求高级职员和员工不得给予或接受任何馈赠物品，譬如礼物、娱乐、膳食、服务、折扣、小费或其他收益（礼物和娱乐），尤其是此类礼品或娱乐的馈赠目的是获取任何违法优势。

The Company's officers and employees should also not accept or offer any gifts or entertainment to or from any person who conducts business with the Company without prior approval from the Compliance Officer, (unless the value of the gift or entertainment is less than the monetary thresholds below, and is not considered inappropriate).

未经合规专员事先批准，公司高级职员和员工也不得接受或提供与公司开展业务的任何人员的任何礼物或娱乐（除非礼物或娱乐的价值低于以下货币价值，且不被视为不恰当的个人利益冲突）。

- Gifts or meals valued at RM450/- per person
- 每人价值 450 马币的礼物或餐饮
  
- Entertainment valued at RM750/- per person
- 每人价值 750 马币的娱乐活动

The Company's directors, officers and employees may only receive a gift or entertainment that exceeds the monetary values above if the local cultural norms dictate that it would be insulting to decline it. The gift or entertainment must then be reported to the management immediately, who will decide whether it should be:

如果当地文化规范规定拒绝接受礼物或娱乐会被视为一种侮辱，则公司董事、高级职员和员工只能接受超过上述货币价值的礼物或娱乐。相关礼品或娱乐必须立即上报管理层，并由管理层决定是否应：



- Retained by the recipient;  
• 由接收者保留;
- Retained for the benefit of the Company;  
• 为公司利益而保留;
- Donated to charity; or  
• 捐赠给慈善机构; 或
- Returned to the donor.  
• 交还于捐赠者。





The following types of gifts and entertainment are never permissible:

以下类型的礼物和娱乐是被禁止的：

- **Illegal:** Any gift or entertainment that would be illegal.  
•非法：任何非法的礼物或娱乐。
- **Tender or bid process:** Gifts or entertainment involving parties engaged in a tender, competitive bidding process or contract negotiation.  
招标或投标过程：参与投标、竞争性招标或合同谈判的各方所提供的礼物或娱乐。
- **Gift certificates:** Where the value is more than RM450;  
•礼券：价值超过 450 马币的礼卷；
- **Cash:** Cash or cash equivalent (such as loans and securities).  
•现金：现金或等值物品（如贷款和证券）。
- **Quid pro quo:** Any gift or entertainment that is a 'quid pro quo' (offered for something in return).  
•交换条件：任何作为“交换条件”的礼物或娱乐活动（以换取回报）。
- **Indecent:** Any gift or entertainment that is indecent, sexually oriented, does not comply with the Company's commitment to mutual respect or that otherwise might adversely affect the Company's reputation.  
不雅：任何不雅及性馈赠的礼物或娱乐，皆不符合公司互相尊重的承诺或可能对公司声誉产生不利影响。

If you are offered an unacceptable gift or entertainment, you must refuse it.

您必须拒绝任何被禁止的礼物或娱乐活动。

### **Bribery and Corruption**

贿赂和腐败

The Company prohibits all forms of bribery and corrupt conduct, including the offering, promising or giving, or requesting, agreeing to receive or accepting, directly or indirectly of bribes or facilitation payments to anyone.

公司禁止任何形式的贿赂和腐败行为，包括直接或间接向任何人提供、承诺或给予、或请求、同意接受或接受贿赂或疏通费。

You must not:

您不可：

- Engage in;  
参与
- Induce or facilitate someone else to engage in; or  
诱导或帮助他人参与；或
- Permit your employees or an agent or representative of your company to engage in,  
•允许您的员工或您公司的代理或代表参与，

any form of bribery or corrupt conduct. This apply irrespective of whether the conduct involves individuals, incorporated or unincorporated organisations and/or public officials.

此规则皆适用于任何形式的贿赂或腐败行为，无论行为是否涉及个人、股份有限公司或非公司企业和/或公职人员。



You must inform the Compliance Officer as soon as possible if, in relation to the Company's business, you are offered a bribe by anyone, if you are asked to make one, or if you have reason to believe that you are a victim of a corrupt activity.

如果在公司业务方面，有人向您行贿，或要求您行贿，或者有理由相信您是腐败活动的受害者，您必须尽快通知合规专员。



<p><i>We must not disclose confidential information</i></p> <p>我们不能透露机密信息</p>	<p><b>Third Party Information</b></p> <p>第三方信息</p> <p>In the course of your involvement with the Company, you may learn confidential information about our customers, suppliers, contractors and other parties with whom we conduct business. This information must not be used or disclosed unless in accordance with instructions from the party who provided the information.</p> <p>在参与本公司的业务过程中，您可能会了解到有关我们的客户、供应商、承包商以及与我们开展业务的其他方的机密信息。除非按照信息提供方的指示，否则不得使用或披露此类信息。</p> <p><b>Company Information</b></p> <p>公司信息</p> <p>In the course of your involvement with the Company, you may come across information relating to the Company's operations, strategy and finances. Unless otherwise advised, you must treat all information about the Company as confidential and must not communicate any information of this nature to any person who is not authorised by the Company to see that information. This applies both during and after your engagement with the Company.</p> <p>在参与公司的业务过程中，您可能会接触到与公司运营、战略及财务有关的信息。除非另获通知，您必须将有关公司的所有信息视为机密信息。任何人未经授权，不可查看或将此类信息传达给他人。此规则适用于您与本公司合作期间和之后的时段。</p>
<p><i>We must compete fairly</i></p> <p>我们必须公平竞争</p>	<p><b>Competition</b></p> <p>竞争</p> <p>The Company is committed to fair competition in all markets in which we operate. When competing for business, we do so vigorously but fairly.</p> <p>公司致力于在我们涉及的所有市场上进行公平竞争。在商业竞争中，我们保持积极但公平的。</p> <p>This means you must:</p>



	<p>这意味着您必须:</p> <ul style="list-style-type: none"> <li>• not intentionally mislead clients, business partners, or competitors;</li> <li>• 不故意误导客户、商业伙伴或竞争对手;</li> <li>• the community;</li> <li>• 社区;</li> <li>• only use the Company's reputation in legitimate ways; and</li> <li>• 仅以合法合规方式使用公司声誉; 和</li> <li>• refuse to associate in illegal market practices such as price fixing schemes, misleading or deceptive conduct, misuse of market power or bid-rigging arrangements.</li> <li>• 拒绝参与非法市场行为, 如违规定价操作、误导或欺骗行为、滥用市场力量或操纵投标安排</li> </ul>
<p><i>We must report accurately</i> 我们必须准确报告</p>	<p><b>Reporting</b></p> <p>报告</p> <p>Honest, accurate, timely and objective recording and reporting of information is essential to: 诚实、准确、及时和客观地信息记录和报告旨在:</p> <ul style="list-style-type: none"> <li>• the Company's credibility and reputation;</li> <li>• 维护公司的公信力和声誉;</li> <li>• meeting the Company's legal and regulatory obligations;</li> <li>• 履行公司的法律和监管责任;</li> <li>• meeting Company's responsibility to shareholders and other stakeholders; and</li> <li>• 履行公司维护股东以及其他利益相关者的责任; 和</li> <li>• informing and supporting the business decisions and actions.</li> </ul> <p>告知并支持公司的业务决策和行动。</p>

	<p>All reports that the Company prepared must accurately reflect transactions and events. Financial information must conform to generally accepted accounting principles and to Malaysian Financial Reporting Standards.</p> <p>公司编制的所有报告必须准确反映交易和事件。财务信息必须符合公认会计原则和马来西亚的财务报告准则。</p> <p>Falsifying or creating misleading information can constitute fraud, and the Company does not tolerate fraud of any kind.</p> <p>伪造或制造误导性信息可构成欺诈罪行，本公司不容忍任何形式的欺诈行为。</p> <p>Senior financial officers and others responsible for the accuracy of financial reporting are also responsible to ensure proper controls are in place to achieve truthful, accurate, complete, objective, consistent, timely and understandable financial and management reports.</p> <p>高级财务官和其他人员有责任于财务报告的准确度，亦有责任确保适当的控制措施到位，以实现真实、准确、完整、客观、一致、及时和可理解性的财务和管理报告。</p> <p>Internal control systems and procedures designed to prevent bribery and corruption shall be subject to regular audits to ensure that they are effective in practice.</p> <p>为防止贿赂和腐败而设计的内部控制制度和程序应接受定期审计，以确保其高效率地执行。</p>
<p><i>Sponsorships and other Donations</i></p> <p>赞助和其他捐赠</p>	<p>The Company does not make political donations.</p> <p>本公司拒绝政治献金或捐款</p> <p>You must be careful to ensure that charitable contributions solicited from the Company are not used to facilitate and conceal acts of bribery.</p> <p>您必须谨慎确保本公司募集的慈善捐款不会被用于行使和导致贿赂行为。</p>



	<p>The Company may undertake sponsorships to enhance the Company’s reputation as a good corporate citizen. The Company may support events and organisations that are aligned with our brand, corporate values and business objectives. Sponsorships should contribute to positive perceptions of our brand and support the Company’s vision.</p> <p>本公司可以提供赞助，以提升公司作为良心企业的声誉。公司可以支持与我们的品牌、企业价值观和业务目标一致的活动和组织。赞助应有助于提升我们正面的品牌和支撑公司的愿景。</p> <p>Any decision or approval regarding sponsorships and donations must be made through the Company’s limits of authority processes or in the absence thereof, by the Board of Directors. 所有赞助和捐赠的决定或批准必须依据公司的权限程序。如果没有权限程序，则由董事会作出决策。</p>
<p><i>Breach reporting and whistleblowing</i></p> <p>违规举报</p>	<p>The Company supports reporting of illegal or improper conduct, provided you have reasonable grounds for your concern 在拥有合理的依据下，公司支持举报违法或不当行为。</p> <p>If you have a concern about illegal or improper conduct occurring in relation to our business, we encourage you to report your concern to the Compliance Officer. Alternatively, if you prefer, you may make a report through the whistleblower service provided by Deloitte Halo. Deloitte Halo is operated and managed by a third party, which is not related to the Company. Deloitte Halo offers: 如果您对有牵连于我们公司业务中的违法或不当行为而感到担忧，我们鼓励您向合规专员举报。或如果您愿意，您可以通过德勤光环（Deloitte Halo）提供的举报服务进行举报。德勤光环（Deloitte Halo）是由独立第三方运营和管理。</p> <p>德勤光环（Deloitte Halo）提供：</p> <ul style="list-style-type: none"> <li>• A confidential way for people to report illegal or improper conduct occurring within the Company without fear of detriment; 以保密方式举报公司内部发生的违法或不当行为，您不必担心受到危害；</li> </ul>



- The choice to maintain anonymous;
- 选择保持匿名;
- Web-based reporting; and  
通过网站进行举报, 和
- 24-hour access, seven days a week.
- 全天候 24 小时举报服务

However, it is also open to you to provide information to appropriate governmental authorities regarding a potential violation of law. You are not required to make a report to the Company prior to reporting a matter to a regulator, although we would encourage you to do so. We recommend that you seek independent legal advice, (which would be at your own cost), before making a report to an external body.

除此之外, 您也可以向有关政府当局提供有关潜在违法行为的信息。在向监管机构举报时, 您不必事先向公司内部举报, 尽管我们鼓励您向我们汇报。我们建议您向有关政府当局举报之前, 寻求独立的法律意见(相关费用由您自行承担)。

There are additional protections under applicable whistleblower laws for those making a report under this Policy, including protection from legal action for making a disclosure. This does not include protection from any legal action for illegal or improper conduct you may have engaged in that is revealed as a result of your report.

根据适用的举报法律法规, 对举报人提供额外保护, 包括对举报人提供的法律免责保护。当然, 这项法律免责并不包括您的非法或不当举报所引起的任何法律诉讼。





The Company does not tolerate the taking of detrimental action against individuals for making a report under this Policy. Any person who takes or threatens to take detrimental action in reprisal will be subject to disciplinary action, which may include dismissal or termination of engagement. If an individual believes that they have been, or are likely to be, disadvantaged in any way because they have made a disclosure, or becomes aware of victimisation or retaliation against another for making such a disclosure, they are encouraged to report this under this Policy.

本公司不会容忍对举报人采取报复行为的行为。任何威胁或采取报复行动的人士将受到纪律处分，包括解雇或终止聘用。如果任何举报人认为他们已经或可能处于任何不利地位，或意识到他人因举报而受到危害或报复，他们应该根据本政策进行汇报。

Disciplinary action may be taken if this Policy is breached. This may include action up to and including dismissal in appropriate circumstances and/or reference to appropriate law enforcement authorities. If you are not one of our employees, we may terminate your engagement or appointment, or take other appropriate corrective action. This may include reference to appropriate law enforcement authorities.

如果违反此政策，可能会受到纪律处分。这包括在适当情况下采取行动，解雇和/或向适当的执法当局举报。如果您不是我们的员工，我们可能会终止您的聘用或任命，或采取其他适当的纠正措施，包括向有关执法当局上报。



<p><i>We must be familiar with the policies, procedures and controls that relate to our work</i></p> <p>我们必须熟悉与工作有关的政策、程序和控制措施</p>	<p><b>Policies &amp; Procedures</b> 政策和程序</p> <p>We must make ourselves aware of the Company's policies and procedures which apply to us and our roles. 我们必须了解适用于我们和本身工作职责的公司政策和程序。</p> <p>We must be clear on our limits of authority and never exceed those limits by committing the Company verbally, in writing or by e-mail. 我们必须明确清楚自己的职责权限，决不能通过口头、书面或电子邮件的方式超越这些权限。</p> <p>The Company's officers and employees (if any) are expected to undertake all applicable training programmes provided by the Company which are designed to help you understand and comply with our policies and procedures 公司的高级职员和员工（如有）应接受公司提供的所有适用培训计划，这些计划旨在帮助您理解和遵守我们的政策和程序。</p>
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	<p>Breaches of limits of authority or procedures detailed in such a document will be subject to appropriate disciplinary action, which may include termination of employment or engagement/contract, as the case may be.</p> <p>违反权限守则或程序将受到适当的纪律处分，其中可能包括终止雇佣或聘用/合同（视情况而定）</p>
<p><i>Record-keeping</i> 记录保存</p>	<p>Documents and records must be retained for a minimum of 7 years or in accordance with the law. If you are unclear about whether a document or record should be retained or destroyed, please contact the assisting compliance officer.</p> <p>文件和记录必须保存至少 7 年或依法保存。如果您不清楚是否应保留或销毁文件或记录，请联系相关合规专员助理。</p>
<p><i>Communication of this Policy to business partners</i> 向商业伙伴传达本政策</p>	<p>This Policy shall be communicated to all suppliers, contractors, business partners and any third parties at the outset of business relations, and as appropriate thereafter.</p> <p>本政策应在业务关系开始时以及之后酌情传达给所有供应商、承包商、商业伙伴和任何第三方。</p>
<p><i>Questionable behavior</i> 可疑行为 – we must take action 我们必须采取行动</p>	<p><b>Behaviour</b> 行为</p> <p>If you have any doubts as to whether a particular conduct breaches this Policy, you are encouraged to take action. In the normal course, concerns should be raised with the Compliance Officer. Likewise, concerns about unethical or illegal business conduct can be reported to the Compliance Officer.</p> <p>如果您质疑某一行为是否违反本政策，我们鼓励您采取行动。在正常的情况下，您应向合规专员提出举报。同样的，您也可向合规专员举报不道德或非法的商业行为。</p>



	<p>After an appropriate investigation, any person who is found to have violated this Policy will be subject to disciplinary, contractual or criminal sanction.</p> <p>经适当的调查后，任何违反本政策的人士将受到纪律处分、合同性或刑事制裁。</p>
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<b>Contact</b> 联络	<b>Details</b> 细节
<b>Compliance Officer</b> 合规专员	WT Partnership (M) Sdn Bhd B02-D-05, Menara 3, No. 3, Jln Bangsar, KL Eco City, 59200 Kuala Lumpur, Malaysia  Email: <a href="mailto:lqcompliance@wtpartnership.my">lqcompliance@wtpartnership.my</a> 电邮:
<b>Assisting compliance Officer</b> 合规专员助理	<b>Risk Officer</b> 风险管控专员  c/o Lendlease Development Malaysia Sdn Bhd Level 8, Menara JCorp, No. 249 Jln Tun Razak 50400 Kuala Lumpur, Malaysia Tel: 03-2385 9888 电话
<b>Whistleblower Channel</b> 举报渠道	<a href="https://secure.deloitte-halo.com/lqwhistleblowing">https://secure.deloitte-halo.com/lqwhistleblowing</a>

\*In the event of a dispute, the English version shall take precedence over the Mandarin translation

\*中英文版本如有歧异，一概以英文版本为准。