

# Anti-bribery management manual

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## Catalogue

0 Preface .....	5
.1. 0 General provisions .....	5
.2. 0 Reference file .....	5
.3. 0 Theme content .....	5
.4. 0 Company profile .....	5
. 1 Purpose .....	6
2. Scope .....	6
3. Organizational structure .....	6
4. Organizational environment .....	7
4.1. Understand the organization and its environment .....	7
4.2. Understand the needs and expectations of the stakeholders .....	7
4.3. Determine the scope of the anti-bribery management system .....	7
4.4. Anti-bribery management system and its process .....	7
4.5. Bribery risk assessment .....	8
. 5 Leadership .....	8
.1. 5. Leadership and commitment .....	8
.2. 5 Anti-bribery policy .....	8
.3. 5. Organize positions, responsibilities and authority .....	8
. 6 Planning .....	9
6.1 Actions to address the risks and opportunities of bribery .....	9
6.2 Anti-bribery target and realization planning .....	9
7. Support .....	9
7.1. Resources .....	9
7.2. Ability .....	10

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7.3. Awareness and training .....	10
7.4. Communication .....	错误! 未定义书签。
7.5., Document information .....	11
8. Run .....	11
8.1. Operation planning and control .....	11
8.2., Due diligence .....	12
8.3., Financial control .....	12
8.4. Non-financial control .....	12
8.5. Implement anti-bribery control measures among the acceptance and control organizations and commercial partners .....	12
8.6. Anti-bribery commitment .....	13
8.7. Gifts, hospitality, donations, and similar benefits .....	13
8.8. Against the management of insufficient bribery control measures .....	13
8.9., Propose the questions .....	13
8.10. Investigation and handling of bribery .....	14
9. Performance evaluation .....	14
9.1., Internal audit .....	14
9.2., Management review .....	14
10. Improvement .....	14
. 10.1 Non-conformity and corrective actions .....	14
10.4. Continuous improvement .....	15

## Annex 1: Anti-bribery targets

## 0 Preface

### 0.1 General Provisions

Bribery is a common phenomenon, and the establishment and implementation of the anti-bribery compensation management system is an important decision of the company. Through the effective implementation of the anti-bribery management system can reduce the cost of business, improve the quality of products and services, and create a fair and efficient operation environment.

### 0.2 Reference file

Requirements for the Anti-Bribery Management System, ISO37001:2016

The Anti-Unfair Competition Law of the People's Republic of China,

### 0.3 Subject content

This manual is the general specification describing the company's anti-bribery management system, is the programmatic document for the company to establish and implement the anti-bribery management system, it shows the overall picture and index of the company's anti-bribery management system;

It includes:..

- 1) Scope of the company's anti-bribery management system, anti-bribery policy, anti-bribery objectives, organizational structure, positions, responsibilities and authority;
- 2) Description of the process of the anti-bribery management system and its mutual relations;
- 3) ISO37001: Interpretive explanation of all provisions of 2016 standard.

It makes it clear:

- 1) ISO37001:2016 standards to be maintained in the documents and retained records;
- 2) ISO37001:2016 standard provisions (understand the needs and expectations of stakeholders); facilitate the understanding, training, implementation and application of the standards.

### 0.4 Company Overview

Alubase industry Co.,Ltd. provides supporting domestic procurement business for

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foreign large industrial enterprises, procurement fields including industrial manufacturing, port materials, equipment, and services, the company provides generous welfare benefits, national statutory holidays, catering and transportation subsidies, etc. Since the establishment of Alubase Industry Co.,Ltd. adhere to the "integrity based, customer first" purpose, in line with the "quality based, excellence" business sales concept, and strive to provide customers with a full range of quality services at the same time, but also make the enterprise get considerable development. We look forward to working together with all the new and old customers in the industry to create brilliant achievements.

## 1 Purpose

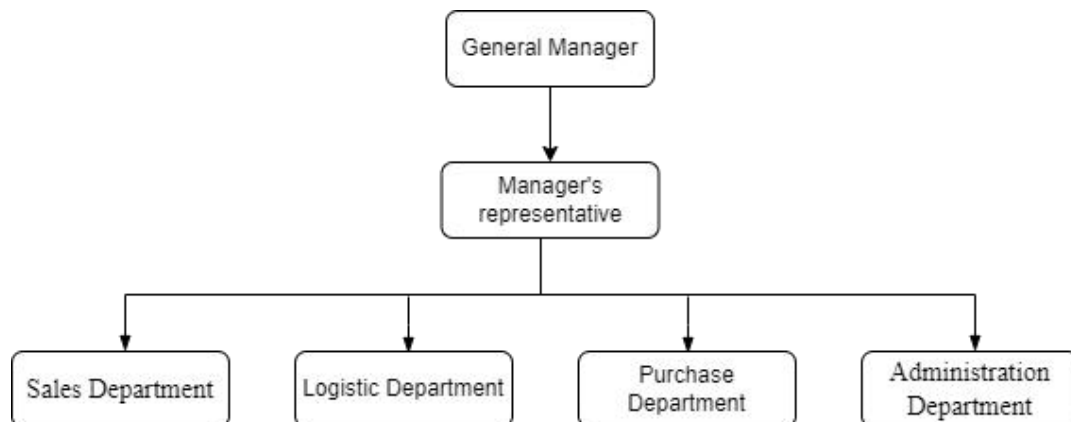
According to ISO37001:2016 standard, this manual specifies the requirements of the anti-bribery management system, and is used to prove that the company can continuously and stably meet customer requirements and applicable laws and regulations.

Through the effective operation of the company's anti-bribery management system and the improvement of the process, ensure the applicable laws and regulations of customers to enhance customer satisfaction.

## 2 Range

The scope of the anti-bribery management system described in this manual applies to the anti-bribery management activities involved in dry: graphite and carbon products, non-metallic minerals, thermal insulation materials, chemical products (excluding licensed chemical products), refractory materials, metal products, metal materials, steel and filter bags.

## 3 Organizational structure



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## 4 Organizational environment

### 4.1 Understand the organization and its environment

The company determines the following internal and external factors that are related to the purpose of honest management and affect the ability of the anti-bribery management system to achieve the goals:

Item.	Factor	Possible impact on the system of management of bribes	Type
1	Business people need to be in contact with customers externally	Possible bribes to customers	Internal factors
2	Procurement staff need to engage with suppliers externally	May receive bribes from suppliers	External factors
3	Administrative staff need to contact with government departments	May pay bribes to government officials	Internal factors
4	Heads of finance departments need to contact bank staff externally	May pay bribes to bank staff	Internal factors

### 4.2 Understand the needs and expectations of the stakeholders

The company identifies the needs and expectations of anti-bribery interests through the following table:

No.	Interested parties	Desire and Expectation	Compulsory	Non-compulsory
1	Marketing Development Business Personnel	Desire for customers to sign a co-operation agreement with the company		▲
2	Supplier	Desire to become a long-term supplier of the company; Desire to be able to pass vendor evaluations in the procurement department		▲
3	Business Integrity Commission	Desire to comply with the law		▲
4	Bank staff	Desire for company deposits to be held in the bank where the work is done		▲

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5	Scrap buyers	Desire Costs Acquisition Company Scrap		▲
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## 4.3 Determine the scope of the anti-bribery management system

On the basis of fully considering the internal and external factors of the organizational environment, the needs and expectations of relevant parties and the risk assessment results, the company has determined the scope of the anti-bribery management system as follows:

Anti-bribery management activities involved in graphite and carbon products, non-metallic minerals, thermal insulation materials, chemical products (excluding licensed chemical products), refractory materials, metal products, metal materials, steel and filter bags

## 4.4 Anti-bribery management system and its process

The Company establishes, implements, maintains and continuously improves the anti-bribery management system, including the required process and their interactions.

## 4.5 Bribery risk assessment

The company identifies and evaluates the bribery risk according to the Anti-Bribery Risk Control Procedure, and takes measures against the medium and high bribery risk.

# 5 Leadership

## 5.1 Leadership and commitment

The general manager demonstrates his leadership and commitment to the anti-bribery management system through the following activities:

- a) Approved the company's anti-bribery policy, and prevented the anti-bribery policy inside and outside the organization;
- b) Regularly collect and review the content and implementation information of the company's anti-bribery management system;
- c) Ensure that the appropriate and sufficient resources needed for the effective operation of the anti-bribery management system are allocated;
- D) To ensure that the anti-bribery management system is established, implemented, maintained and reviewed, so as to fully deal with the bribery risks of the organization;
- E) Ensure that the requirements of the anti-bribery management system are integrated into the company's business process;
- F) to convey the importance of effective anti-bribery management and meeting the



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requirements of the anti-bribery management system within the organization;

G) Ensure that the anti-bribe compensation management system achieves the expected results;

H) To guide and encourage employees to contribute to the effectiveness of the anti-bribery management system;

I) Create an appropriate anti-bribe compensation culture within the company;

J) To promote continuous improvement;

K) Support other relevant management positions to prevent and detect bribery in their respective areas of responsibilities;

L) Encourage employees to report suspicion and actual bribery;

M) Ensure that employees are not subject to retaliation, discrimination or disciplinary action in good faith or in reasonable belief in reporting violations or suspected violation of the organization's anti-bribery policy or in refusing to participate in bribery (where the organization may lose a business opportunity) (except for personal violation of participation).

## **5.2 Anti-bribery policy**

5.2.1 Anti-Bribery Policy formulated, reviewed and maintained by the General Manager.

5.2.2 For business partners with medium and high risk of bribery (more than low risk), the Company shall convey the anti-bribery policies in appropriate forms such as management manual and publicity board.

## **5.3 Organize positions, responsibilities and authority**

5.3.1, posts and responsibilities

A) The General Manager shall assume the overall responsibility of implementing and complying with the anti-bribery management system described in 5.1.2, and ensure that the responsibilities and authority of the relevant positions are assigned and communicated within the organization.

B) Managers at all levels shall ensure that their departments or responsibilities apply and follow the requirements of the anti-bribery compensation management system.

C) The General Manager and all other employees shall understand, observe and apply the requirements of the anti-bribery management system related to their position; their responsibilities are detailed in the relevant Anti-bribery System Terms and Department Responsibility Distribution Form and Job Description

5.3.2 Anti-bribery compliance function, the manager grants the following responsibilities

and authority:

- A) Supervise the implementation of the company's anti-bribery management system;
- B) Provide suggestions and guidance on the anti-bribe compensation management system and related issues;
- C) To ensure that the anti-bribery management system meets the requirements of ISO37001:2016;

And d) report the performance of the anti-bribery management system to the general manager and other compliance functions. The Company provides the Integrity Committee with adequate resources and personnel with appropriate capacity, status and independence. Should any problems or concerns related to the bribery or anti-bribery management system arise, the ICAC may report to the General Manager directly and timely.

### 5.3.3 Commissioned decision-making

The general manager gives each department head the responsibility or authority to make decisions on medium-high risk events, and the authority for the ICAC to supervise the decision-making process of each department and the "decision-making person" is appropriate, and there is no actual or potential conflict of interest.

## 6 Planning

### 6.1 Actions to address the risks and opportunities of bribery

According to the Anti-Bribery Risk Control Procedure, the company considers the internal and external factors related to the purpose, the needs and expectations of the relevant parties, and the risk of the bribery risk of the anti-bribery management system, so as to plan

- a) Reasonably ensure that the anti-bribery management system can achieve its goals;
- b) Preventing or reducing unexpected impacts related to anti-bribery policies and targets;
- c) Monitoring the effectiveness of the anti-bribery management system;
- d) continuous improvement. The company plans measures to deal with these risks and opportunities and integrate these measures into the organization's anti-bribery management

System processes and implement them to evaluate the effectiveness of these measures when appropriate.

## 6.2 Anti-bribery target and realization planning

The company establishes anti-bribery targets in the relevant functions and levels, and the company's anti-bribery targets:

- a) Consistent with the anti-bribe compensation policy;
- b) Measurable ones (if operational);
- c) Considering the company environment, requirements of relevant parties and identified bribery risks;
- d) might-have-been;
- e) Can monitor;
- f) Can convey;
- g) Updated when applicable.

See Annex I for details of the company's anti-bribery targets.

The integrity Committee of the company formulated the anti-bribery implementation plan according to the Anti-Bribery Goals to determine the realization of the relevant anti-bribery goals

Who is responsible, what resources are needed, when to complete it, and how to evaluate and report it.

## 7 Support

### 7.1 Resources

The organization shall identify and provide the resources needed for the establishment, implementation, maintenance and continuous improvement of the anti-bribery management system.

### 7.2 Ability

#### 7.2.1 General Provisions

The company establishes and operates the Human Resource Control Procedure to:

- a) To determine the ability required to influence anti-bribery performance under their control;
- b) Ensure that these personnel are qualified with the right educational background, training or experience;
- c) Where applicable, measures may be taken to obtain and maintain the necessary capabilities and to evaluate the effectiveness of the measures taken;
- d) Retain appropriate documented information as evidence of competence.

Note: Applicable measures include, for example, providing training, guidance, reredistribution, hiring or signing to employees and business partners

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Great talent or a business partner.

## 7.2.2 Employment procedures

7.2.2.1 For all employees, the organization shall perform the following procedures:

Develop the Employment Control Procedure for control.

a) The terms of employment require employees to comply with the anti-bribery policy and the anti-bribery management system, and to retain the organization who violates the discipline

The right to dispose of it;

b) Conduct anti-bribery policy and training related to the policy within one month after the employee's employment;

c) Those who violate the relevant requirements of the anti-bribery management system will be disciplined according to the Control Procedures for Handling Bribery;

d) Employees will not be punished (such as, demotion, promotion restriction, disciplinary action, post transfer, or dismissal, bullying)

Or hurt):

- 1) Refuse to participate or break the contract because the bribery risk of the activity is beyond the low risk level and the company has not controlled the risk;
- 2) Good faith or reasonable belief in reporting attempts, actual or suspected bribery or violation of anti-bribery policy or anti-bribery management system (excluding individual participation in illegal activities).

7.2.2.2 The Company shall implement the following procedures for the employees with medium and high bribery risk and all the employees who undertake the compliance functions

A) Conduct due diligence before employment, transfer or promotion to determine that hiring or transferring them is appropriate and reasonably able to believe that they will comply with the requirements of anti-bribery policies and anti-bribery management system;

B) Regular review of employee performance bonuses, performance goals and other salary incentives to ensure that reasonable measures are taken to prevent bribery;

C) Such employees and general managers must regularly issue statements based on the level of risk identified, indicating their compliance with the anti-bribery policy.

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## 7.3 Awareness and training

The company provides employees with adequate and appropriate anti-bribery awareness and training for employees, which properly addresses the following issues on the basis of considering the results of bribery risk assessment:

a) The organization's anti-bribery policies, procedures and anti-bribery management system and the responsibilities of employees;

b) The risk of bribery and the harm that bribery can cause to employees and organizations;

c) Potential bribery payments related to employee functions and how to identify them;

d) How do the employees prevent and avoid bribery, and identify the key bribery risk indicators;

e) Employees' contribution to the effectiveness of the anti-bribery management system, including improving the anti-bribery performance and reporting the benefits of suspected bribery

f) The impact and potential consequences of not complying with the requirements of the anti-bribery management system;

g) How and to whom to report problems when found;

And h) of the available training and resource information. The company regularly provides the anti-bribery awareness training for the employees according to their positions, the risk of bribery and the changing environment.

The company regularly updates its awareness and training programmes as needed to reflect the latest relevant information.

## 7.4 Communication

7.4.1 The Company determines the internal and external communication related to the anti-bribery management system, and lists the Communication List. See Annex II for the Communication List.

7.4.2 The Company shall disclose its anti-bribery policies to all employees and business partners and communicate directly with employees and business partners beyond the low risk of bribery; the organization shall publish the anti-bribery policies through its appropriate internal and external communication channels.

## 7.5 File Information

### 7.5.1 General Provisions

The written information of the company's anti-bribery management system

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includes:

- a) ISO37001: Written information required by the 2016 standard;
- b) Other written information determined by the company to ensure the effectiveness of the anti-bribery management system, in the anti-bribery compensation of the company

Be filed or index in the manual and procedure documents.

## 7. 5.2 Create and Updates

The Company establishes the Document Control Procedure to clarify the classification, number, version, form and carrier of documents, the formulation and operation arrangement, approval authority, issuance and retrieval and other related requirements. Ensure the suitability and adequacy of written information when created and updated.

## 7.5.3 Control of documentation and records

The Company establishes the Document Control Procedure to clarify the latest status of all kinds of documents related to the anti-bribery management system to facilitate access, retrieval and use.

Documents should be properly stored and protected in safe and dry places, and fire prevention, moth prevention, moisture prevention and leaks to maintain their readability.

The Company establishes the Record Control Procedure to stipulate the management of relevant records of the anti-bribery management system.

# 8 Run

## 8.1 Operation planning and control

The Company plans, implements, monitors and controls the process of meeting the requirements of the anti-bribery management system, and implements the measures determined in accordance with the Anti-Bribery Risk Control Procedure, and these measures include:

- a) Establish guidelines for the process;
- B) control the process according to the guidelines;
- C) the retention confirmation process is the necessary document information implemented according to the plan. These processes shall include the specific tubes in 8.2 to 8.10

Control measures.

The Company controls the planned changes and evaluates the unexpected consequences and, if necessary, takes measures to reduce any adverse effects.

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## 8.2 Due diligence

The Company establishes the Due Diligence Control Procedure to conduct due diligence on the following medium and high risks identified according to the Anti-Bribery Risk Control Procedure:

A) Specific transaction, project, or activity type;

And b) planning or establishing ongoing business relationships with a particular type of business partner; or

And c) certain employees in specific positions.

## 8.3 Financial control

The Company establishes a management system and process to manage the financial transactions and to make the correct, complete and timely record of these financial transactions. The company's financial control measures include:

a) The separation of duties prevents the same person from having the power to propose and approve funds at the same time;

B) Conduct the appropriate gradient authorization system for payment approval;

C) To ensure that the appointment and work or service of the payer have been approved by the relevant approval mechanism of the organization;

D) At least two signatures are required for payment approval;

E) Payment approval requires appropriate supporting documents;

F) to limit the use of cash and adopt effective cash control methods;

G) Ensure that the classification and description of the account are accurate and clear;

H) Conduct regular management review of major financial transactions;

I) Conduct regular and independent financial audits and regularly change the personnel or organizations.

## 8.4 Non-financial control

The Company establishes a management system and process for the reasonable management of procurement, operations, business and other non-financial businesses. The measures to be implemented include:

A) Use of the prequalified subcontractors, suppliers, and consultants. Their participation in bribery needs to be assessed during the prequalification process probability. If the bribery risk is assessed to be medium and high bribery risk, due diligence should be conducted before cooperation to determine whether it cooperates.

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b) estimate :

1) The necessity and legality of the services provided by business partners (except customers or customers) to provide services to the organization;

2) Whether the supplier's services are properly provided;

3) Whether it is reasonable or appropriate to pay for the business partners; it is particularly important to avoid the risk that the business partners will bribe in the name of the money paid to them by the organization.

C) If permitted and reasonable, the contract shall be concluded after a fair and transparent bidding activity involving at least three bidders;

D) At least two people need to evaluate the bidder and approve the contract respectively;

E) Implement the separation of responsibilities to separate the employees of contract budget approval, contract budget requirements, contract management and contract approval;

F) Contract and, modification of the contract terms or at least two signatures of the supplier approval documents;

G) Implement stricter management and supervision on transactions with potential high bribery risk;

H) Protect the integrity of bidding and other sensitive price information, and restrict the acquisition of relevant information by personnel;

J) Provide employees with suitable tools and templates (e. g., practice guidelines, code of conduct, approval levels, incense inspection lists, forms, IT workflows, etc.).

## **8.5 Implement anti-bribery control measures among controlled organizations and business partners**

8.5.1 Other organizations within its jurisdiction:

A) Implement the organizational anti-bribery management system

And b) implement its own anti-bribery control measures.

Develop the Business Partner Control Program for control.

In each case, the implementation of the above two situations is reasonable and appropriate only after considering the bribery risk assessment implemented in 4.5 and the bribery risk faced by the controlled organization.

## **8.6 Anti-bribery commitment**

When the bribery risk of commercial partners (except customers) is medium to high risk, we shall sign the Anti-Bribery Commitment and the Anti-Bribery Commitment with



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employees before cooperation.

## **8.7 Gifts, hospitality, donations, and similar benefits**

The Company establishes the Benefits Control Procedure to prevent the provision, preparation or acceptance of gifts, hospitality, donations and similar benefits for the purpose of bribery or on grounds to be regarded as bribery.

## **8.8 Management of insufficient anti-bribery control measures**

When the Company conducts due diligence according to the Due Diligence Control Procedure, it finds that the existing anti-bribery control measures cannot manage the bribery risks, and the Company cannot or fails to implement additional or improve the existing anti-bribery control measures or take other appropriate measures to enable the organization to manage the relevant bribery risks, the Company shall:

a) In the event of a transaction, a project, activity or business relationship, appropriate measures shall be taken according to the risk and nature of the transaction, project, activity or relationship; terminate, stop, suspend, or cancel the transaction, project or activity as soon as possible

Or business relationship.

And b) a proposed new transaction, project, activity or business relationship.

## **8.9 Ask the questions**

The Company formulates the Control Procedures for Reporting and Investigation to stipulate that:

A) Enable employees to report to the Integrity Commission any intent, suspicious and actual bribery or any violation of or

The shortcomings of the system;

b) Except for the investigation or legal requirements, the company keeps the reported information confidential to protect the identity information of the informant or other persons involved in the report.

C) Allow anonymous reporting;

And d) protect employees in good faith or on reasonable faith to raise or report intent, suspicious or actual bribery or commit contrary

The problems in the bribery management system are them from retaliation and prohibit such retaliation;

E) enabling employees to get advice from the right person when encountering a problem or situation that may involve bribery;

F) Employees are encouraged to report it. The Company helps to ensure that all

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employees are aware and able to use the reporting procedure and understand the reporting procedure

Give it the rights and protection of the channels.

## **8.10 Investigation and handling of bribery**

The company investigates and deals with bribery according to the requirements of Reporting and Investigation Control Procedure and Bribery Handling Control Procedure.

## **9.1 Monitoring, measurement, analysis, and evaluation**

The monitoring of the company's anti-bribery management system mainly includes the following points:

- a) Effectiveness of the training;
- B) the effectiveness of the control measures;
- C) the validity of the assignment of responsibilities to meet the compliance obligations;

And d) the validity of handling the identified non-compliance items;

E) Internal compliance audit is not performed as planned.

Monitoring of compliance performance may include the following points, such as:

- 1) Non-compliance and attempted events ("events" with no negative impact);
- 2) Failure to fulfill the compliance obligations;
- 3) The completion of the target;
- 4) The current situation of the compliance culture.

## **9.2 Internal audit**

The Company formulates the Internal Audit Control Procedure and conducts an internal audit at least once a year to confirm whether the anti-bribery management system meets the ISO37001 standards and the internal requirements of the Company, and whether it has been effectively implemented and maintained.

## **9.3 Management review**

In order to ensure the continuous, stable, appropriate and effective operation of the anti-bribery compensation management system, the general manager reviews the anti-bribery management system every year according to the Management Review and Control Procedure.

# **10 Improve**

## **10.1 Non-conformity and corrective actions**

In case of inconsistency, the company shall be at: :

- A) Timely response to non-compliance, when applicable:

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- 1) Take control measures and correct non-conformity;
- 2) Deal with the consequences.

Bb) Measures required to eliminate the causes of nonconformity in order to not occur again or occur elsewhere:

- 1) Review-conformity;
- 2) Determine the reasons for non-conformity;
- 3) Check whether there is the possibility of similar inconsistency or its occurrence.

C) Any measures required to be taken;

And d) review the effectiveness of the corrective actions taken;

E) If necessary, modify the anti-bribery compensation management system.

The corrective action corresponds to the impact of the nonconformance encountered. Specific according to the non-conforming corrective Action control procedures.**10.2, for continuous improvement**

Through internal audit, management review, risk control, target control improvement, the company continuously improves the suitability, adequacy and effectiveness of the anti-bribery management system.

### Annex 1: Anti-bribery targets

Order No.	Top class	Anti-bribery targets	Statistic frequency	Responsible department	Statistical department
1	Company level	0 Take bribes	monthly	The whole company	Clean government committee
2	Department	0 Bribery	monthly	sales	Clean

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	ent level			department	government committee
3	Department level	0 Take bribes	monthly	Logistics Department	Clean government committee
4	Department level	0 Take bribes	monthly	purchase department	Clean government committee
5	Department level	0 Take bribes	monthly	Administration Department	Clean government committee

### Annex 2: Provisions of anti-bribery system and distribution table of department responsibilities

regulation number	Standard Terms Name	general manager	Clean government committee	Administration Department	sales department	purchase department	Logistics Department
<b>4</b>	<b>Organizational background</b>						
4.1	Understand the organization and its environment	△	▲	△	△	△	△
4.2	Understand the needs and expectations of those involved	△	△	△	▲	△	△
4.3	Determine the scope of the	△	▲	△	△	△	△

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	anti-bribery management system						
4.4	Anti-bribery management system	△	▲	△	△	△	△
4.5	Risk assessment of bribery	△	▲	△	△	△	△
<b>5</b>	<b>Leadership</b>						
5.1	Leadership and commitment	▲	△	△	△	△	△
5.2	Anti-bribery policy	▲	△	△	△	△	△
5.3	Role, responsibilities, and authority of the organization	▲	△	△	△	△	△
<b>6</b>	<b>plan</b>						
6.1	Actions to address the risks and opportunities of bribery	▲	△	△	△	△	△
6.2	Anti-bribery target and realization planning	△	▲	△	△	△	△
<b>7</b>	<b>support</b>						
7.1	resource	▲	△	△	△	△	△
7.2	ability	△	△	△	△	▲	△
7.3	be conscious of	△	△	△	▲	△	△
7.4	communicate	△	△	△	△	▲	△
7.5	Document information	△	△	▲	△	△	△
<b>8</b>	<b>move</b>						
8.1	Operation planning and control	▲	△	△	△	△	△
8.2	responsible investigation	△	△	△	△	△	▲
8.3	financial control	△	▲	△	△	△	△
8.4	Non-financial control	△	▲	△	△	△	△
8.5	Implement anti-bribery control measures in controlled organizations and business partners	△	△	△	▲	△	△
8.6	Anti-bribery commitment	△	△	△	△	▲	△
8.7	Gifts to entertain donations and similar benefits	△	△	△	▲	△	△
8.8	The management of insufficient anti-bribery control measures	△	△	△	△	▲	△
8.9	introduce a question	△	▲	△	△	△	△
8.10	Investigate and handle bribery	△	▲	△	△	△	△
<b>9</b>	<b>performance appraisal</b>						
9.1	Monitoring, measurement, analysis, and evaluation	▲	△	△	△	△	△
9.2	internal check	▲	△	△	△	△	△
9.3	management review	▲	△	△	△	△	△
9.4	Review of anti-bribery compliance functions	▲	△	△	△	△	△

## Alubase Industry Co.,Ltd.

10	improve		△				
10.1	Nonconformity and corrective action	▲	△	△	△	△	△
10.2	continuous improvement	▲	△	△	△	△	△

R5.3-02

Note: ▲, Main responsibilities △ Secondary or coordination responsibilities