



## **D & O GREEN TECHNOLOGIES BERHAD**

Company No 200401006867 (645371-V)

### **ANTI-BRIBERY AND CORRUPTION FRAMEWORK**

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## A) Objective, Definitions and Scope

### Objective

The Code of Ethics and Conduct of D & O Green Technologies Berhad (“the Company”) and its subsidiaries worldwide (“collectively with the Company, “the Group”) approved by the Board of Directors of the Company sets out the core principles in relation to anti-bribery and corruption whereby **the Group upholds the highest standards of integrity in all business interactions and zero-tolerance on any and all forms of Gratification** (including but not limited to, acts to promise, offer, give, accept or obtain any Gratification and/or any attempt thereof). Officers and Employees who refuse to pay bribes or participate in acts of corruption will not be penalised even if such refusal may result in losing business. All business dealings should be transparently performed and accurately reflected on record with monitoring and enforcement procedures implemented to ensure compliance with anti-corruption laws and best practices.

The core objective of this Anti-Bribery and Corruption Framework (“ABC Framework”) is to establish adequate procedures as well as policies and controls to ensure the Group’s compliance with the principle of zero-tolerance on any and all forms of Gratification as well as applicable Anti-Bribery and Corruption laws and regulations. In addition, it is an overriding principle that the Group's businesses are to be conducted in an honest and ethical manner. This ABC Framework is also to encourage the reporting of any form of Gratification in good faith in confidence without the fear of reprisal.

If a law of the country in relation to anti-bribery and corruption conflicts with the policy or procedure set out in this ABC Framework, the law of the country in relation to anti-bribery and corruption shall prevail. However, if a local custom or practice conflicts with this ABC Framework, this ABC Framework shall prevail.

### Definition

“ABCM” is defined as Anti-Bribery and Corruption Management established and implemented by the Group in the management of Bribery and Corruption risks and to comply with the relevant laws and regulations in relation to Anti-Bribery and Corruption.

“ABCC” is defined as Anti-Bribery and Corruption Committee comprising each representative from the departments below:-

- a) Human Resource department
- b) Finance department
- c) Sales and Marketing department
- d) Purchasing department

“Agent” is as defined under Section 2 of the Malaysian Anti-Corruption Commission Act 2009 and any amendment thereof after the effective date of this ABC Framework.

“Associate” is as defined under Section 2 of the Malaysian Anti-Corruption Commission Act 2009 and any amendment thereof after the effective date of this ABC Framework.

“Business Associate” is defined as an external party with whom the Group has, or plans to establish some form of business relationship. This may include clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors.

“Bribery and Corruption” is defined as any action which would be considered as an offence of giving or receiving ‘gratification’ under the Malaysian Anti-Corruption Commission Act 2009 and any amendment thereof after the effective date of this ABC Framework. Therefore, such acts involve the offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person who is in a position of trust within an organisation.

“Conflict of Interest” is defined as when a person’s own interests either influence, have the potential to influence, or are perceived to influence their decision making at the Group.

“Controlled organisation” is defined as an entity whereby the Company or any of its subsidiary has the decision-making power over the organisation such that it has the right to appoint and remove the management, i.e. where the Company or any of its subsidiary has the controlling interest (>50% of the voting share ownership) or where the Company or any of its subsidiary has the right to appoint the management but owns less than 50% of the voting shares.

“Corporate Hospitality” is defined as corporate events or activities (including but are not limited to sporting events, gala dinners, concerts or activity-based events, such as, golf tournaments organised by an organisation) which involves the entertainment of Employees and third parties (i.e. including customers, potential customers, contractors, external companies and any other stakeholders with whom a business relationship, whether current, prospective or historic exists) for the benefit of that organisation.

“Employee” is defined as any person who is in the employment of the Group, including but not limited, to executives, non-executives, secretaries, secondees and individuals on direct hire.

“Facilitation Payment” is defined as illegal or unofficial payment made in return for services which the payer is not legally entitled to receive without making such payment and normally are payments made to secure or expedite the performance by a person performing a routine or administrative duty or function.

“Foreign Public Official” is as defined under Section 2 of the Malaysian Anti-Corruption Commission Act 2009 and any amendment thereof after the effective date of this ABC Framework.

“Gratification” is as defined under Section 2 of the Malaysian Anti-Corruption Commission Act 2009 and any amendment thereof after the effective date of this ABC Framework and includes but is not limited to abuse of function, abuse of public property, bribery, clientelism/cronyism, concealments, corruption, embezzlement, illicit enrichment, insider trading, kickback, money laundering, nepotism, obstructing of justice, patronage, trading in influence and facilitation of money.

“High Risk Country” is defined as countries perceived to have high levels of corruption and which have a score of less than 50 based on the Corruption Perception Index published by Transparency International.

“Investment” is defined as investment in any name called but not resulting in significant influence over such company or entity and solely for the purpose of generating of passive income from the excess fund.

“Lobbying” is defined as any direct or indirect communication with public officials, political decision-makers or representatives for the purposes of influencing public decision-making and carried out by or on behalf of any organised group.

“Monetary Instrument” is as defined under Section 2 of the Malaysian Anti-Corruption Commission Act 2009 and any amendment thereof after the effective date of this ABC Framework.

“Officers” is defined any person as defined under Section 2 of the Malaysian Companies Act 2016 and any amendment thereof after the effective date of this ABC Framework, including but not limited to, Executive and Non-Executive Directors.

“Officer of Public Body” is as defined under Section 2 of the Malaysian Anti-Corruption Commission Act 2009 and any amendment thereof after the effective date of this ABC Framework.

“Person Connected” is as defined under Section 197 of the Companies Act 2016 and any amendment thereof after the effective date of this ABC Framework and including Relatives.

“Political Exposed Person” is defined as an individual who is or has been entrusted with a prominent public function by any country.

“Principal” is as defined under Section 2 of the Malaysian Anti-Corruption Commission Act 2009 and any amendment thereof after the effective date of this ABC Framework.

“Property” is as defined under Section 2 of the Malaysian Anti-Corruption Commission Act 2009 and any amendment thereof after the effective date of this ABC Framework.

“Public Officials” is defined as Officer of a Public Body and/or Foreign Public Official.

“Relative” is as defined under Section 2 of the Malaysian Anti-Corruption Commission Act 2009 and any amendment thereof after the effective date of this ABC Framework.

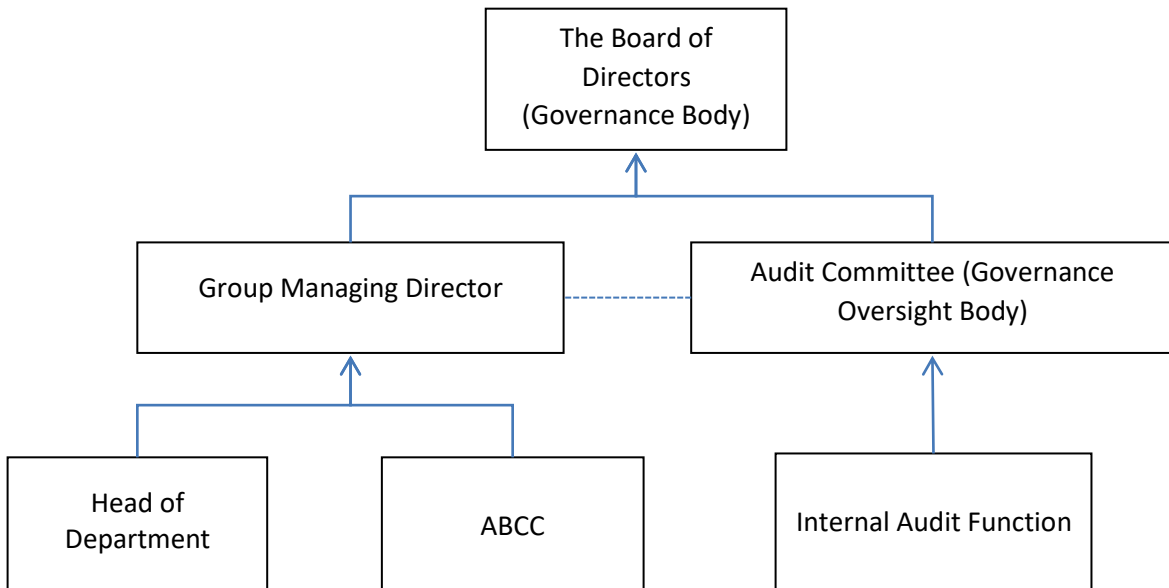
## Scope of ABC Framework

**THIS ABC POLICY IS APPLICABLE TO ALL OFFICERS AND EMPLOYEES OF THE GROUP AND CONTROLLED ORGANISATIONS.**

**All Business Associates acting on the Group’s behalf (including but not limited to, contractors, sub-contractors, consultants, agents, representatives and others performing work or services for or on behalf of the Group) will have to comply with the principles, policies and procedures as established in this ABC Framework when performing their work or services.**

Associated companies of the Group and joint-venture companies in which the Company or its subsidiary(ies) is a non-controlling co-venturer are encouraged to adopt the principles, policies and procedures as established in this ABC Framework.

## B) Governance Structure, Roles and Responsibilities



The Board of Director shall review the ABC framework for every two years or as and when required to ensure that the framework fulfils the current operation requirements and is sufficiently comprehensive for the Board to discharge its functions and duties to meet ABC objective. The roles and responsibilities of each function in the ABC governance structure is as follows:

### **Function**

### **Roles/Responsibilities**

**Board of Directors (“the Board”)** : Primarily responsible for Anti-Bribery and Corruption Management (“ABCM”) and ABC Policy on group wide basis. This would involve:

**Board of Directors** :  
**("the Board")**  
**(Cont'd)**

- (a) To provide ultimate leadership and commitment to ABCM and promoting appropriate ABC culture within the Group;
- (b) To review, determine and approve the Group's ABCM and ABC Policy and to ensure that such ABCM and ABC Policy is in line with the Group's mission, vision, strategies and business objectives;
- (c) To set the risk appetite in relation to bribery and corruption risks and to review the results of the risk assessment in relation to bribery and corruption risks of the Group (at least on an annual basis) and determine the adequacy of the scope of coverage and acceptability of the residual bribery and corruption risks of the Group and proposed management action plan(s) (if applicable);
- (d) To ensure the adequacy and effectiveness of the Group's governance, ABCM and control structure and processes to manage bribery and corruption risks of the Group to a level acceptable to the Board;
- (e) To review the performance on the compliance of ABCM on quarterly basis and as and when required, including but not limited to, non-compliance of ABCM and responses, results of scheduled internal audit that cover bribery and corruption risks from Audit Committee. allocation of resources and responsibilities, progress of management action plans to rectify or improve management of bribery and corruption risks, training and communication on bribery and corruption risks and to ensure corrective action taken to address the shortcomings and continuous improvements implemented to enhance the ABCM; and
- (f) To review the incidents reported under ABCM's reporting channel and whistleblowing channel, the progress of the investigations, the results of the investigation, whether adequate management action plans taken to rectify and resolve the incidents reported and to ensure that the identity of the whistleblower is protected and such whistleblower will be protected from reprisal, including any form of harassment and victimisation, as a consequence of his genuine disclosure and comply with relevant laws and regulations in relation to protection of whistleblower.

**Audit Committee (“AC”)** : Delegated with the oversight roles and responsibilities on group wide by the Board in relation to ABCM:

- (a) To review and assess the Group’s ABCM and ABC Policy to ensure its adequacy and effectiveness in line with the ABC commitment and risk appetite by the Board and whether it is in line with the Group’s mission, vision, strategies and business objectives with the results and recommendation reported to the Board;
- (b) To review the implementation and compliance with approved Group ABCM and ABC Policy (including policies and processes) and to ensure that bribery and corruption risks identified are being responded to appropriately with the results and recommendation reported to the Board;
- (c) To review the results of the risk assessment in relation to bribery and corruption risks of the Group (at least on an annual basis) and determine the adequacy of the scope of coverage and acceptability of the residual bribery and corruption risks of the Group and proposed management action plan(s) (if applicable) with the results of its review and recommendation reported to the Board;
- (d) To review the adequacy and effectiveness of the Group’s governance, ABCM and control structure and processes to manage bribery and corruption risks of the Group to a level acceptable to the Board with the results of its review and recommendation reported to the Board;
- (e) To review the reports on the performance on the compliance of ABCM on quarterly basis and as and when required, including but not limited to, non-compliance of ABCM and responses, results of scheduled internal audit that cover bribery and corruption risks, allocation of resources and responsibilities, progress of management action plans to rectify or improve management of bribery and corruption risks, training and communication on bribery and corruption risks and to review the corrective action taken to address the shortcomings and continuous improvements implemented to enhance the ABCM with the results of the review and recommendation reported to the Board;

**Audit Committee  
("AC")  
(Cont'd)**

- (f) To review the reports on the incidents reported under ABCM's reporting channel and whistleblowing channel, the progress of the investigations, the results of the investigation, whether adequate management action plans taken to rectify and resolve the incidents reported and to review the procedure that the identity of the whistleblower is protected and such whistleblower will be protected from reprisal, including any form of harassment and victimisation, as a consequence of his genuine disclosure with the results of the review and recommendation reported to the Board and comply with relevant laws and regulations in relation to protection of whistleblower;
- (g) To review whether adequate and appropriate resources are allocated and assigned to implement ABCM and for effective and efficient operation of the ABCM with the results of the review and recommendation to be informed to the Group Managing Director and reported to the Board;
- (h) To review the adequacy and effectiveness of the Group's ABCM and internal control system established and implemented by head of department to manage bribery and corruption risks through internal audit reports from Internal Audit Function with the results of the review reported to the Board; and
- (i) Request Group Managing Director and/or engage external parties (including internal auditor) to perform investigation at the expense of the Group.

**Group Managing  
Director**

- : Delegated with the roles and responsibilities by the Board in relation to ABCM on group wide basis:
- (a) To champion the cause of an adequate and effective ABCM throughout the Group, including setting the ABCC, in order to achieve the ABC commitment and objectives approved by the Board and to cultivate appropriate ABC culture within the Group;
  - (b) To ensure ABCM, including objective, policy and procedures, is designed, established, implemented, maintained and reviewed to adequately and effectively manage bribery and corruption risks;
  - (c) To ensure that ABCM, including objective, policy and procedures, is integrated into the Group's business processes and to all levels of the Group, horizontally



**Group Managing Director (Cont'd)**

and vertically;

- (d) To ensure that adequate and appropriate resources are allocated and assigned to implement and for effective and efficient operation of ABCM and ABCC including provide proper guidance and direction;
- (e) To undertake continuous improvement on the ABCM to ensure its adequacy, effectiveness and relevance to the changes in internal and external business context and relevant ABC laws and regulations; and
- (f) To establish appropriate reporting channel for suspected and actual bribery and corruption cases, including procedure that the identity of the informer and whistleblower is protected and such informer and whistleblower will be protected from reprisal, including any form of harassment and victimisation, as a consequence of his genuine disclosure and to ensure compliance with the relevant laws and regulations in relation to protection of whistleblower.

**ABCC**

: Delegated with the roles and responsibilities by Group Managing Director in relation to ABCM and ABC Policy on group wide basis as follows:

- (a) To act as central contact and guide for all ABCM and ABC Policy within the Group and to provide advice and guidance to Officers, Employees and Business Associates on the ABCM and ABC Policy and any issues in relation to anti-bribery and corruption;
- (b) To ensure adequate training in relation to ABC are provided to all Officers and Employees within the Group, Associates, Agents, associate companies, joint venture companies and Business Associates as well as to obtain their commitment on the compliance of the ABCM and ABC Policy.
- (c) To oversee the implementation of ABCM and ABC Policy (including training and communication) approved by the Board;
- (d) To oversee the risk assessment in relation to bribery and corruption risks of the Group (at least on an annual basis) by RSMWG and to provide guidance on the adequacy of the scope of coverage and acceptability of the residual bribery and corruption risks of the Group and proposed management action plan(s) (if

**ABCC (Cont'd)**

applicable);

- (e) To ensure that appropriate enhanced measures and controls (including but not limited to, due diligence) are established for activities, Officers/Employees and Business Associates that are deemed to be more than low-bribery and corruption risks;
- (f) To ensure adequate and effective communication of the ABC Policy and ABCM, including the requirement to comply thereof, throughout the Group and externally with all stakeholder groups;
- (g) To act as recipient of ABCM's incident-reporting channel, to perform investigation on incidents reported under the channel, to determine appropriate action to be taken on the results of the investigation and to report the progress of the investigations, the results of the investigation, whether adequate management action plans taken to rectify and resolve the incidents reported and to ensure that the identity of the informer is protected and such informer will be protected from reprisal, including any form of harassment and victimisation, as a consequence of his genuine disclosure and comply with relevant laws and regulations in relation to protection of whistleblower;
- (h) To monitor activities performed and report the monitoring results (including but not limited to incidental reporting) to Group Managing Director, and
- (i) To document all ABCM activities and meetings within the Group.

**Head of  
Departments of  
the Company and  
Controlled  
Organisation  
("HOD")**

: Delegated with the roles and responsibilities by Group Managing Director in relation to ABCM and ABC Policy:

- (a) To ensure ABCM, including objective, policy and procedures, is implemented and maintained to adequately and effectively manage bribery and corruption risks;
- (b) To integrate ABCM and ABC Policy into the business processes under his/her control;
- (c) To continuously identify bribery and corruption risks and evaluate existing controls. If controls deemed ineffective, inadequate or non-existent, to establish and implement controls to reduce the likelihood and/or impact of bribery and corruption;

## **HOD (Cont'd)**

- (d) To update Risk Sheet and report to ABCC of the emergence of new bribery and corruption risks or change in the existing bribery and corruption risks in a timely manner;
- (e) To assist with the development of the management action plans and implement these action plans;
- (f) To ensure that staff working under him/her understand the ABCM and ABC Policy and the importance of the compliance of ABCM and ABC Policy; and
- (g) To liaise with ABCC to provide training to staff working under his/her department or any business associate that he/she deals with. – Part L Training and Communication

## **Internal Audit Function**

Internal audit function is responsible for:

- (a) To perform review, based on the internal audit plan reviewed by the Audit Committee and approved by the Board, on the adequacy and effectiveness of the Group's governance, ABCM and control structure and processes to manage bribery and corruption risks of the Group to a level acceptable to the Board and to report the same to the Audit Committee;
- (b) To review whether all relevant bribery and corruption risks have been identified and managed adequately for business activity(ies) under review and to report the same to the Audit Committee; and
- (c) Verifying compliance with the ABCM, ABC Policy and Procedures and relevant anti-bribery and corruption laws and regulations and to report the same to the Audit Committee.

## **ABC Committee**

### **Authorities**

ABCC is vested with the following authorities:

- have the adequate resources which it needs to perform its duties;
- have full access to any information which it requires in the course of performing its duties;
- have direct communication channels with Group Managing Director, the Audit Committee and the Board, as the case may be, to obtain information and feedback

- in performing its duties and to report the results of the review of the ABCM and ABC Policy and the compliance thereof;
- delegate the roles and responsibilities of ABCC to competent senior personnel in any departments within the Group, except in relation to incident reporting under ABCM's incident reporting channel and investigation thereof; and
  - to obtain the services of the external professional at the expense of the Group in carrying out its duties.

ABCC have the authority to carry out investigation on the suspected and actual bribery and corruption cases reported to him/her and to determine appropriate action to be taken on the results of the investigation after reporting to Group Managing Director. ABCC needs to ensure that the identity of the informer is protected and such informer will be protected from reprisal, including any form of harassment and victimisation, as a consequence of his/her genuine disclosure which is in compliance with relevant laws and regulations in relation to protection of whistleblower. In order to protect the informer's interests, he/she shall report the incident via the Whistleblowing channel as stipulated in the Whistleblowing Policy of the Company.

#### **i. Meetings**

- ABCC shall meet at least once every half year. The quorum for a meeting shall be 100% of all the existing members of the ABCC.
- Any member of the ABCC may call for a meeting as and when required with reasonable notice as such members deem fit (preferably 5 business days' notice with agenda of matters to be discussed).
- ABCC may invite any non-member and external professionals who the ABCC thinks fit and proper to attend its meeting to assist in its deliberations and resolutions of matters raised.
- Semi-annual ABCC meeting shall be chaired by a representative from Human Resource Department and every discussion shall be minuted by a secretary and documented according to Human Resource Department documentation storage standard operating procedure. For non-scheduled meeting, the meeting shall be chaired by the member of the ABCC who called for the meeting.

#### **ii. Confidentiality**

- All members of ABCC shall have an obligation to treat all information received and discussed in carrying out its duties and responsibilities and in the meeting in a confidential manner.

### **Risk Assessment**

The risk assessment process shall be governed by the Risk and Opportunity Management Policies and Procedures approved by the Board and shall be performed by the Company and individual subsidiaries individually and submitted to the ABCC for review and to

determine adequacy of existing and proposed control activities to mitigate existing and potential bribery and corruption risks.

## C) ABC Policy

### 1. Gift Policy

- The Group has adopted a **"No Gift" policy** whereby, subject only to exceptions listed in this policy, all Officers, Employees, Business Associates acting for or on behalf of the Group or Persons Connected with such Officers, Employees or Business Associates acting for or on behalf of the Group are prohibited from directly or indirectly receiving or providing gifts.
- It is the responsibility of the Officers, Employees and Business Associates acting for or on behalf of the Group to inform all parties involved in any business dealings with the Group that the Group practices a **"No Gift" Policy** and to request the external party's understanding for and adherence with this policy.
- There are certain types of gift which are never permissible and the Officers, Employees, Business Associates acting for or on behalf of the Group should immediately refuse if it involves the below (including but not limited to):
  - Any gift of cash or cash equivalent. Cash equivalent could be in the form of vouchers, discounts, coupons, gift cards, etc.
  - Receive or provide gift in High Risk Country.
  - Any gift that would be illegal or in breach of local or foreign bribery and corruptions laws.
  - Any gift which is lavish or excessive that may adversely affect the reputation of the Group.
  - Any gift which is given in conflict of interest situation (e.g. bidding is in progress and the company that gives the gift is one of the bidders).
  - Any gift that comes with a direct / or indirect suggestion, hint, understanding or implication that in return for the gift some expected or desirable outcome is required.

The Group operates in various countries around the world with diverse practices, laws and cultures. The relevant Controlled Organisation have its own Anti-Bribery and Corruption Policy adapted and consistent with the objectives and principles of this Framework after taking into consideration local laws, customary practices, standards of living and cultures, subject to review by ABCC and approved by the Controlled Organisation's Managing Director.

#### A: Receiving or Providing Gifts

The Board is very much aware that the exchange of gifts can be a very delicate matter, where in certain cultures gift giving is a part of business etiquette. Receiving or providing a gift on behalf of the Company or Controlled Organisation is allowed subject to approval from ABCC and Group Managing Director or the Controlled Organisation's Managing Director.

In the event if receiving of gift is not approved, the gift must be politely returned with a note of explanation about the Company's "No-Gift Policy".

Any gift(s) received by a Company Director should be declared to and approved by 2 other Board members.

Human Resource Department shall prepare monthly listing of gift received or provided during the month and submitted to ABCC for review and report to the Group Managing Director.

### **B: Exceptions to the "No-Gift Policy"**

Any gifts or contribution done during the Group's function i.e.: annual dinner, family day, appreciation dinner and etc will not be regarded as bribery.

Receiving or providing gifts are permitted in the following situations:-

- i) Exchange of gifts at the Company-to-Company level (e.g.: gifts exchanged between companies as part of an official Company visit/courtesy call and thereafter the said gift is treated as the Group's property; or
- ii) Token gifts received or given out during events such as conferences, official visit, exhibitions, training, job fair, cultural celebrations, funeral, etc and deemed as part of the Group's brand-building or promotional activities; or
- iii) Gifts from the Group to Officers, Employees, Business Associates acting for or on behalf of the Group in relation to an internal or externally recognised Company function, event and celebration (e.g. in recognition of an Officer's or Employee's service to the Company); or
- iv) Gifts to external parties (mainly for monetary gifts or gifts in-kind to charitable organizations) who have no business dealings or future business dealing(s) in the foreseeable future with any Controlled Organisation or the Company.

## **2. Entertainment and Corporate Hospitality**

Corporate hospitality is recognized as a legitimate way to network and build goodwill in a business relationship. Officers, Employees and Business Associates acting for or on behalf of the Group must exercise proper care and judgment before receiving or providing corporate hospitality from/to third parties. Any corporate hospitality activities that would involve public officials shall require approval from the ABCC and Group Managing Director or Controlled Organisation's Managing Director.

Officers, Employees and Business Associates acting for or on behalf of the Group are strictly prohibited from receiving or offering to provide entertainment with a view to improperly cause undue influence on any party in exchange for some future benefit or results.

Certain types of entertainment activities are never permissible and Employees should immediately refuse if it involves the following:

- a) Any entertainment that comes with a direct/indirect suggestion, hint, understanding or implication that in return for the entertainment provided some expected or desirable outcome is required.
- b) Any entertainment activities that would be illegal or in breach of local or foreign laws.
- c) Any entertainment activities that would be perceived as extravagant, lavish, and excessive or may adversely affect the reputation of the Group.
- d) Any entertainment activity that is sexually oriented or may otherwise tarnish the reputation of the Company.

All entertainment and corporate hospitality shall be guided by respective Controlled Organisation's Anti-Bribery and Corruption Policy. As the Group operates in various countries around the world with diverse practices, laws and cultures, the relevant Controlled Organisation have its own Anti-Bribery and Corruption Policy adapted and consistent with the objectives and principles of this Framework after taking into consideration local laws, customary practices, standards of living and cultures, subject to review by ABCC and approval by the Controlled Organisation's Managing Director.

Every Subsidiary shall prepare a monthly summary of the **Gift/Entertainment/Corporate Hospitality/Travelling Register Form** duly completed during the month and submit to ABCC for review and report to the governance body.

### 3. Travelling

#### Receiving or Providing Travelling Benefit

Receiving or providing any form of travelling benefit from/to customers, suppliers or business associates are only permitted if it does not result in conflict of interest situation, approval obtained and in order to facilitate the products and services received or provided by the Group.

- 1) Permitted travelling benefit is restricted to the necessary travel, accommodation and meal expenses directly associated with a reasonable travel itinerary related to the purpose of the visit (for example, certification of the work done, inspection of sites, etc.).
- 2) Receiving or providing travelling benefit are never permissible if it involves the following:
  - a) Any travelling benefit that comes with a direct / indirect suggestion, hint, understanding or implication that in return for the travelling benefit provided some expected or desirable outcome is required.
  - b) Any travelling benefit that would be illegal or in breach of local or foreign bribery laws.
  - c) Involving customers, suppliers, business associates or public officials in a High Risk Country.

- d) Vacation of any kind to customers, suppliers, business associates, friends or public officials or family members of such person(s).
- e) Any travelling benefit and associated entertainments that is sexually oriented or which may otherwise tarnish the reputation of the Group.

All provisions of travelling benefit by all Officers and Employees shall be subject to the payment procedure implemented by the Finance Department, with the important details of the provision of travelling, name of the organisation and representatives that the provision of travelling benefit is provided to, recorded and posted accordingly in the accounting system for monitoring.

The Human Resource Department shall prepare a monthly listing of the travelling benefit received or provided during the month and submit to ABCC for review and shall report to the governance body.

The Group operates in various countries around the world with diverse practices, laws and cultures. The relevant Controlled Organisation have its own Anti-Bribery and Corruption Policy adapted and consistent with the objectives and principles of this Framework after taking into consideration local laws, customary practices, standards of living and cultures, subject to review by ABCC and approved by the Controlled Organisation's Managing Director.

#### **4. Any other forms of activities for Personal Interest / Gratification**

All Officers, Employees (inclusive of ex-Officer / ex-Employee) and Business Associates acting for or on behalf of the Group must not misuse their office or position to conduct any inappropriate activities for any gratification, whether for himself/herself, related parties or associate. 'Inappropriate activities' includes:

- Instructing Officers or/and Employees to carry out activity(ies) for any gratification that is not related to the Group day-to-day business operation;
- Instructing Officers or/and Employees to carry out activity(ies) for any gratification that is not within Employees Benefits Entitlement defined by Human Resource Department;
- Carrying out instructions from higher authority to conduct inappropriate activities; or
- Spreading unverified information or falsifying documents/information regarding the Group in order to gain any form of gratification or advantage in the course of performing the duties.

#### **5. Corporate Social Responsibility / Donation / Sponsorship**

As part of the Group's commitment to corporate social responsibility and sustainable development, the Group does provide such assistance in appropriate circumstances and manner. All charitable donations, contributions and sponsorship provided by the Group must be compatible with our business activities and reflect the Group's commitment to operate in an ethical manner.

Charitable donations or sponsorship may only be made to a properly established charity or organization (subject to approval from ABCC and Group Managing Director or individual Controlled Organisation's Managing Director) where:



- There is a valid charitable purpose for the donation and the donation or sponsorship is not prohibited by local law;
- The donation or sponsorship is not made to secure an improper business advantage;
- The transaction is properly recorded as a 'donation' or 'sponsorship'; and
- Human Resource Department shall perform a know-your charity organization due diligence on a case-to-case basis and report to the Group Managing Director before conducting any charity donations or sponsorship activities.

The Group does not make political donations and the Group is not affiliated with any political party, independent candidate or with any other organization whose activities are primarily political.

Officers and Employees are free to make personal donations provided such payments are not purposely made on behalf of the Group and are not made to obtain any form of advantage in any business transaction.

The Human Resource Department shall prepare a monthly listing of the activities conducted on corporate social responsibility/donation/sponsorship during the month and submit to ABCC for review and shall report to the governance body.

## **6. Facilitation Payment / Kickbacks**

All Officers, Employees and Business Associates acting for or on behalf of the Group must not offer, promise, give, request, accept or receive anything which might reasonably be regarded as a facilitation payment.

## **7. Money Laundering**

All Officers, Employees and Business Associates acting for or on behalf of the Group must not be involved, directly or indirectly in any money laundering activities.

## **8. Dealing with Public Officials and Political Exposed Person**

All Officers, Employees and Business Associates acting for or on behalf of the Group must not offer, promise, give anything which might reasonably be regarded as a gift, entertainment, corporate hospitality, CSR programme, donation, sponsorship to Public Officials or Political Exposed Person or Person Connected to them in a High Risk Country.

All Officers, Employees and Business Associates acting for or on behalf of the Group must not offer, promise, give anything which might reasonably be regarded as a gift, entertainment, corporate hospitality, CSR programme, donation, sponsorship to Public Officials or Political Exposed Person or Person Connected to them in a country other than a High Risk Country unless it is permissible under the applicable laws and regulations and prior approvals are obtained from the individual Controlled Organisation's Managing Director or the Group Managing Director and subject to the maximum threshold applied, i.e. RM 100 or RM equivalent thereof.

The Group operates in various countries around the world with diverse practices, laws and regulations. The relevant Controlled Organisation have its own Anti-Bribery and Corruption Policy adapted and consistent with the objectives and principles of this Framework after taking into consideration local laws, customary practices, standards of living and cultures, subject to review of ABCC and approved by the Controlled Organisation's Managing Director.

## **9. Lobbying**

All Officers, Employees and Business Associates acting for or on behalf of the Group must not participate in any lobbying activities and must not offer, promise, give anything which might reasonably be regarded as lobbying fees.

## **10. Recruitment, Promotion and Support of Officer and Employee**

The Group recognizes the value of integrity in its Officers and Employees. The Group's recruitment, training, performance evaluation, remuneration, recognition and promotion for all personnel, including management, shall be designed and regularly updated to recognize integrity.

Human Resource Department shall perform employee background check and other recruitment procedure accordingly to Human Resource Department standard operating procedure before proceeding with any recruitment.

The Group must not offer employment to prospective personnel in return for their having improperly favored the Group in a previous role.

## **D) Responsibilities of Officers and Employees**

- 1) All Officers and Employees of the Group are required to carry out those responsibilities and obligations relating to the Group's anti bribery and corruption stance, alongside that already in existence, which include the following:
  - Be familiar with applicable requirements and directives of the policy and communicate them to subordinates;
  - Promptly record all transactions and payment accurately and with reasonable details;
  - Ask the ABCC if any questions about this policy arise or if there is a lack of clarity about the required action in a particular situation;
  - Always raise suspicious transactions and other 'red flags' to immediate superiors for guidance on the next action;
  - Be alert to indications or evidence of possible violations of this policy;
  - Promptly report violations or suspected violations through appropriate channels;
  - Attend required anti-bribery and corruption training as required according to position; and
  - Not misuse their position or the Group's name for personal advantage.

- 2) When dealing with business associates, all Officers and Employees of the Group shall not:
  - express unexplained or unjustifiable preference for certain parties;
  - make any attempt at dishonestly influencing their decisions by offering, promising or conferring advantage;
  - exert improper influence to obtain benefits from them; or
  - directly or indirectly offer to make promise or corrupt payments, in cash or in kind for a specific favour or improper advantage from them.
- 3) During an active or anticipated procurement or tender exercise, Officers and Employees participating in the exercise in any way whatsoever, shall not:
  - Receive gifts or hospitality or any kind from any external party participating, planning to participate, or expected to participate, in the procurement or tender exercise;
  - Receive anything other than a corporate gift and token hospitality from any external/third party related to the exercise which said gift shall be recorded;
  - be involved in any discussions regarding business or employment opportunities, for personal benefit or for the benefit of person connected or external party;
  - abuse the decision-making and other delegated powers given by the top management and;
  - bypass normal procurement or tender process and procedure.
- 4) When dealing with external parties who are in a position to make a decision to the Group's benefit (such as a Government Officer or Customer), Officers and Employees shall not:
  - offer, promise or make any attempt at dishonestly influencing the person's decision by directly or indirectly offering or make promise of corrupt payments, in cash or in kind;
  - be involved in any discussions regarding business or employment opportunities, for their own personal benefit or for the benefit of person connected or external party;
  - otherwise abuse the decision-making and other delegated powers given by the top management, in order to illicitly secure an outcome which would be to the commercial advantage to themselves and or the Group; and
  - exert improper influence to obtain personal benefits from them.
- 5) Department Head have a particular responsibility to ensure that the ABCC requirements are applied and complied with within their department or functions and to monitor compliance with the policy.

## **E) Financial & Non-Financial Controls / Record Keeping**

- I. The Financial Controller will implement and administer financial and accounting controls designed to detect and prevent improper payments under anti-bribery laws and assure the accuracy of all Finance records with respect for those payments. All accounts, invoices and other documents and records relating to dealing with third parties should be prepared and maintained with strict accuracy and completeness.

All gifts, entertainment and hospitality as well as promotional or marketing payments, charitable contributions, donations and sponsorships must be properly declared,

approved and recorded. A summary of the non-compliance activities will be updated to the ABCC once a month (if present) and subsequently report the same to the Group Managing Director for disciplinary action.

## II. Prevention of bribery risk with appropriate financial controls

Financial controls are the management systems and processes implemented by the organization to help it ensure and manage financial transactions properly and to record accurately, completely and in a timely manner. These controls are primarily intended to ensure that the financial resources of the organization are properly used, protected and recorded and are only paid out to legitimately appointed personnel or business associates for legitimate work properly done. Financial controls are listed as below but not limited to:

- The authorization of expenditure and payment in relation to transactions should require the approval of the authorized personal.
- Approval should be given by a person (s) of appropriate seniority.
- The authorization of expenditure and payment in relation to transactions should require the approval of a manager(s) of appropriate seniority.
- Ensure that the payee's appointment and work, services or supplies carried out have been approved by the organization's relevant approval mechanisms.
- Require the appropriate supporting documentation to be annexed to payment approval. The person(s) approving the relevant payment should have easy access to the appropriate appointment and approval documentation so that the approver can verify that the payment is appropriate. Therefore the documentation should be attached to the payment request or is easily accessible.
- Limit cash transaction and implement effective cash control measures.
- Ensure that payment categorizations and descriptions in the accounts are accurate and clear. The organization's accounting system should be carefully categorized and controlled so that all payments are accurately described and recorded.
- Implement periodic financial audit. The Company should implement appropriate financial auditing of its process and expenditure. Audit could be by either or both an internal or external audit process.

Other than financial records, individual department shall ensure that his/her department's records/documents be kept according to a specific timeframe based on the Company's standard operating procedure.

## III. Non-Financial Controls/Due Diligence

Non-financial controls as well as due diligence processes are put in place to prevent or detect the occurrence of the bribery and corruption risk or mitigate the impact. Non-financial control and due diligence was implemented according to respective departments' Standard Operating Procedure.

## **F) Conflict of Interest**

A conflict of interest arises in any situation in which an individual is in a position to take advantage of his or her role at the Group for his or her personal benefit, including the

benefit of his or her family and friends. A conflict of interest can make it difficult for an individual to fulfil his or her duties impartially and correctly. A conflict of interest can exist even if it results in no unethical or improper acts. Even the appearance of improper influence in decision-making may be an issue. A conflict of interest will undermine the values of good faith, fidelity, diligence and integrity in the performance of duties and obligations as expected.

All Officers, Employees and Business Associates acting for or on behalf of the Group must avoid situations in which personal interest could conflict with their professional obligations or duties and must not use their position and authorities, the Group's resources and assets, or information available to them for personal gain or for the benefit of the person connected to such person (including their friends) or to the Group's disadvantage.

All Officers, Employees and Business Associates acting for or on behalf of the Group shall comply with the **Code of Ethics and Conduct** of the Group approved by the Board of the Company and subject to the **Conflict of Interest and Related Party Transaction Policy** of the Group established by the Board.

Apart from the compliance of the **Conflict of Interest and Related Party Transaction Policy** of the Group, all Officers, Employees and Business Associates acting for or on behalf of the Group shall declare their interests and relationship via **Declaration of Interest Form** to the Human Resource Department (for Officers and Employees) and respective departments (for Business Associates acting for or on behalf of the Group):

1. before a business relationship is established;
2. changes in the directorship held in any Company;
3. holds directly or indirectly more than 5% share capital of any Company; and
4. at any other time, if they become aware of an actual conflict of interest, potential conflict of interest or perceived conflict of interest.

Actual conflict of interest is when a real and existing conflict of interest is present.

A potential conflict of interest is when the Officers, Employees and Business Associates acting for or on behalf of the Group are in or could be in a situation that may result in a conflict, but this has not fully materialised.

A perceived conflict of interest is when the Officers, Employees and Business Associates acting for or on behalf of the Group are in or could be in a situation that may appear to be a conflict, even if this is not the case.

If the Officers, Employees and Business Associates acting for or on behalf of the Group are unsure whether they have either an actual, potential or perceived conflict of interest, they should consult ABCC for advice alternatively, if in doubt, the Officers, Employees and Business Associates acting for or on behalf of the Group are advised to make a declaration to the Human Resource Department (for Officers and Employees) and respective departments (for Business Associates acting for or on behalf of the Group).

Any Officers, Employees and Business Associates acting for or on behalf of the Group who fail to comply with the requirements under this Part, shall be in violation of this

Framework and such non-compliance shall be dealt with in accordance with **Part K - Dealing with Non-Compliance**.

## **G) Advice and Speak Up Channel**

### **i. Advice Channel**

Advice Channel provides information and answers queries about the anti-bribery programme and ABCC responsible for the Advice Channel internally and externally.

### **ii. Speak-Up Channels**

**Speak-Up Channels** for the ABCM consists of two independent channels:

- i. **ABCM's incident reporting channel** – The member of the ABCC not involved in the functions and activity reported is to perform investigation on incidents reported under the channel, to determine appropriate action to be taken on the results of the investigation and to report the progress of the investigations, the results of the investigation, whether adequate management action plans taken to rectify and resolve the incidents reported and to ensure that the identity of the informer is protected and such informer will be protected from reprisal, including any form of harassment and victimisation, as a consequence of his genuine disclosure and comply with relevant laws and regulations in relation to protection of whistleblower. In the event that the ABCC is the alleged wrongdoer in relation to the incident to be reported, the informer can report genuine wrongdoings to other members of the ABCC.

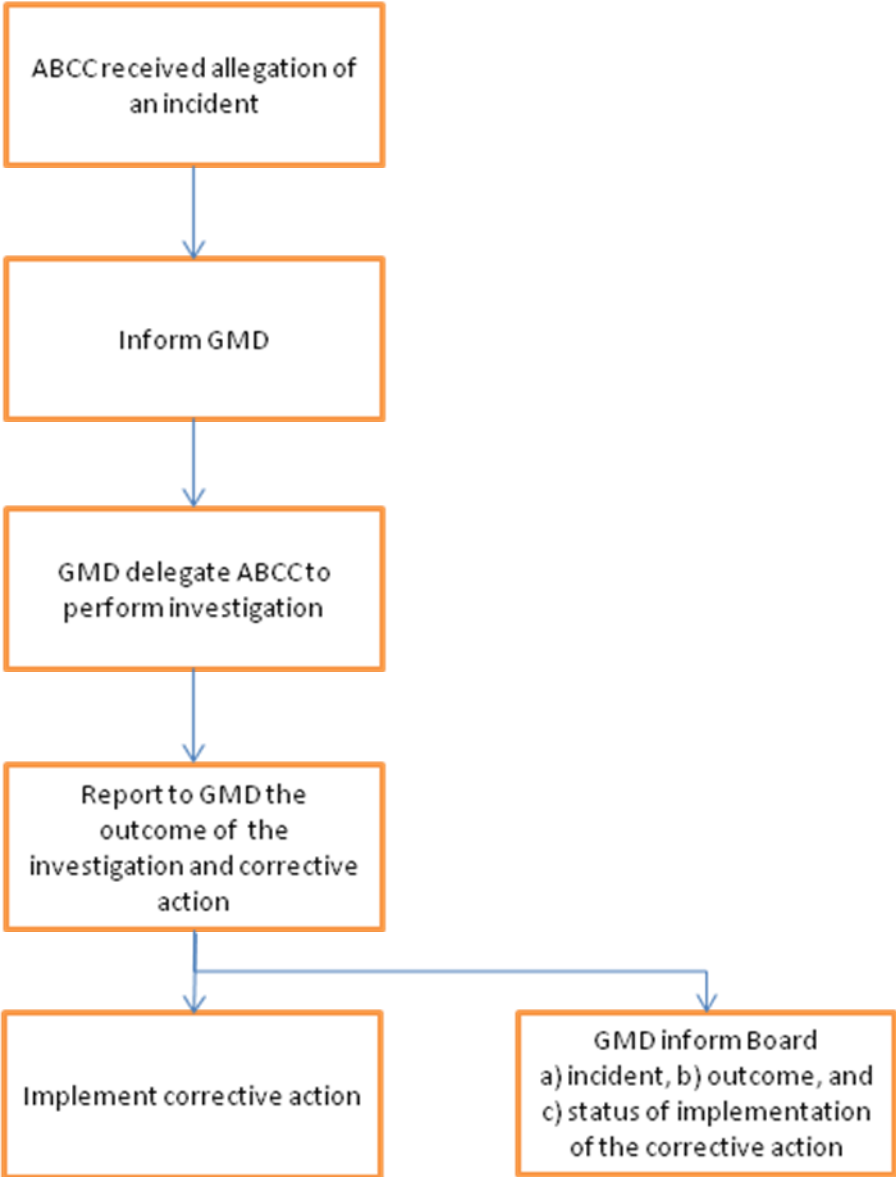
The members of the ABCC are as follows:

- 1) Senior Human Resource Manager
  - 2) Group Financial Controller
  - 3) Purchasing Manager
  - 4) Sales Manager
- ii. **Whistleblowing Channel** – if for any reason the stakeholder is reluctant to do so or the designated Compliance Officer or both the members of the ABCC are involved in the roles or functions being reported, then the stakeholder should report the incidents directly to the Audit Committee Chairman via the Whistleblowing Policy whereby the confidentiality of the whistleblower is to be preserved and such informer will be protected from reprisal, including any form of harassment and victimisation, as a consequence of his genuine disclosure and comply with relevant laws and regulations. Please refer to Whistleblowing Policy as published in the Group's corporate website.

## H) Incidental Management

**Incident management** is a procedure to anticipate and manage incidents promptly, thoroughly and efficiently. The Group identifies potential and actual incidents via monitoring mechanism performed by ABCC, audits, advice and speak-up channels, report to authorities and media allegations or by the authorities as a consequence of other investigations.

### Allegation of Incidental to ABCC



On receiving information or allegation of an incident, the Officers or Employees or Business Associate concerned should inform and consult the ABCC and flag the incident immediately to the Group Managing Director. All alleged bribery and corruption incidents should be investigated by ABCC to establish their credibility (via protect and review documentation and electronic files, conduct internal audit and third party interviews, enforce its Business Associate audit rights, etc.), as well as the scale and severity of the issues involved, which will determine the appropriate level of response on the results of the investigation as soon as possible. ABCC needs to ensure that the identity of the informer is protected and such informer will be protected from reprisal, including any form of harassment and victimisation, as a consequence of his genuine disclosure which is in compliance with relevant laws and regulations in relation to protection of whistleblower.

The ABCC shall, upon the assurance of the occurrence of valid and genuine bribery and corruption incident based on the results of the investigation and approval from Group Managing Director, communicate internally and to the relevant stakeholder (including the whistleblower) via electronic means or written manner on the facts of the bribery and corruption incident and the corrective action taken or to be taken on the bribery and corruption incident.

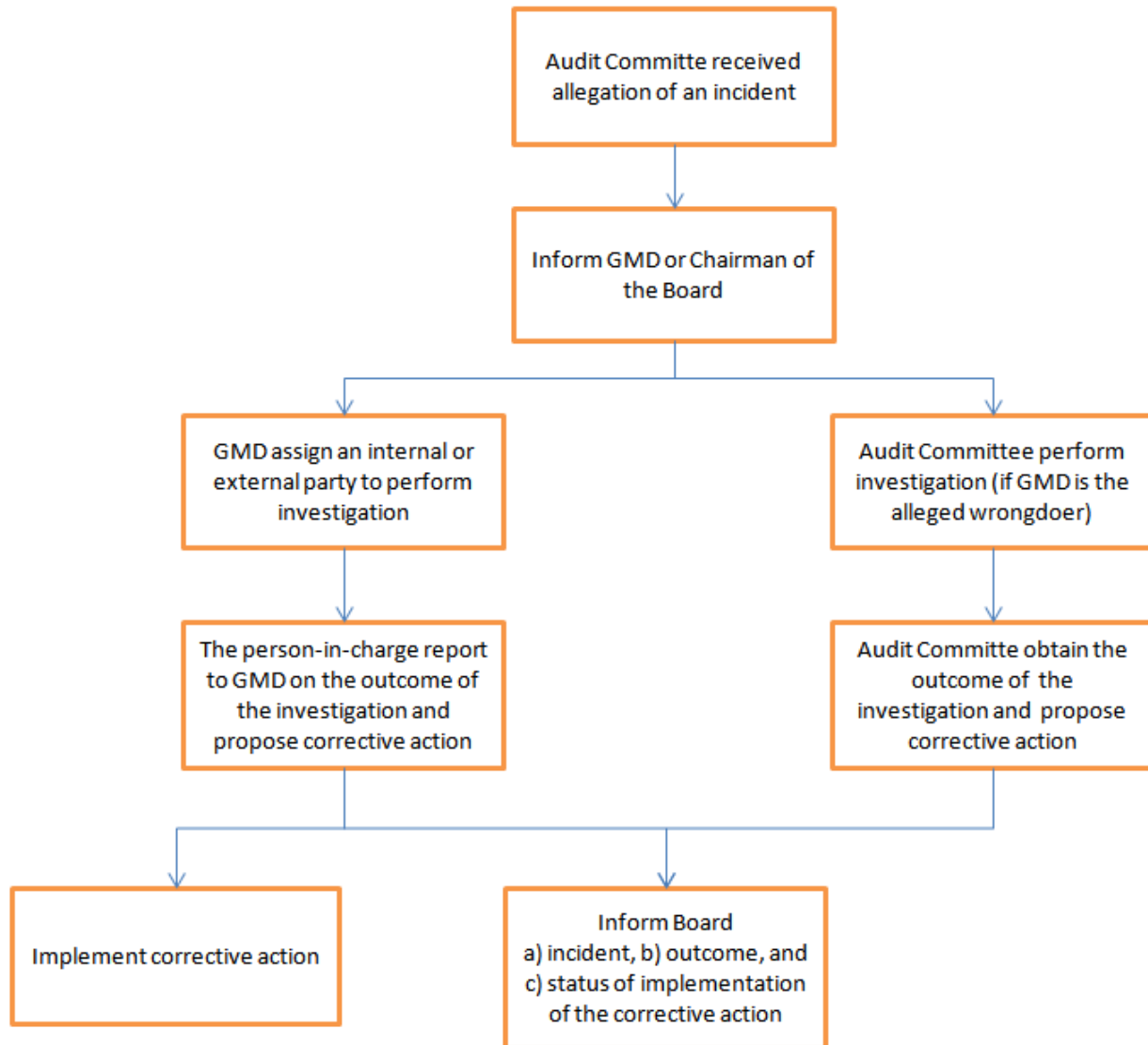
Group Managing Director shall, on the advice of the ABCC if the seriousness of the bribery and corruption incident warrant such public disclosure to uphold the Group ABC commitment and to reduce losses to the public, announce publicly on the occurrence of the bribery and corruption incident and the corrective action taken and to be taken.

The ABCC shall report to the relevant regulator, as soon as practical, if the bribery and corruption incident is against any applicable laws and regulations.

<p>Incident Management</p>	<ul style="list-style-type: none"> <li>• If possible bribery is detected, the issue is dealt with immediately by ABCC (including but not limited to, investigation) and reported to Group Managing Director. Group Managing Director shall inform governance body in confidence and need-to-know basis.</li> </ul> <p><u>Corrective action</u></p> <ul style="list-style-type: none"> <li>• If bribery has been made by an Officer, Employees or Business Associate on the Group’s behalf, the incident is reviewed by ABCC and reporting to the authorities if the ABCC reasonably believe that the involvement of the authorities is required from investigation and law and regulations requirement or if it justified by the results of investigation.</li> <li>• If bribery has been made by an Officer, Employees or Business Associate, contract or agreement should be reviewed and a decision made as to whether mitigation can take place or the employment or contract should be terminated.</li> <li>• Audit rights should be exercised when there is reasonable suspicion bribery has occurred and the Business Associate has not addressed concerns in a satisfactory manner.</li> <li>• All non-compliance with this Framework and/or relevant laws and regulations in relation to anti-bribery and corruption in any jurisdiction, if proven, shall be dealt with in accordance with <b>Part K – Dealing with Non-Compliance.</b></li> </ul>
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## Allegation of Incident to Audit Committee



On the other hand, when Audit Committee received information or allegation of an incident, Audit Committee shall seek for support from Group Managing Director. Group Managing Director will delegate the investigation process to ABCC as stated above.

However, if Group Managing Director is the alleged wrongdoer, Audit committee shall immediately report the incident to the chairman of the Board. The whole investigation process will be conducted by Audit Committee with support from management or independent auditor at the Company's expense. Audit Committee will determine the appropriate level of response on the results of the investigation. Audit Committee needs to ensure that the identity of the informer is protected and such informer will be protected from reprisal, including any form of harassment and victimisation, as a consequence of his genuine disclosure which is in compliance with relevant laws and regulations in relation to protection of whistleblower.

Upon the assurance of the occurrence of valid and genuine bribery and corruption incident based on the results of the investigation, The Group Managing Director or the Chairman of the Board, as applicable, will communicate internally and to the relevant stakeholder (including the whistleblower) via electronic means or written manner on the facts of the bribery and corruption incident and the corrective action taken or to be taken on the bribery and corruption incident.

If the seriousness of the bribery and corruption incident required public disclosure to uphold the Group ABC commitment and to reduce losses to the public, the Board will make announce publicly on the occurrence of the bribery and corruption incident and the corrective action taken and to be taken.

The Board shall report to the relevant regulator, as soon as practicable, if the bribery and corruption incident is against any applicable laws and regulations.

<p>Incident Management</p>	<p><u>Corrective action</u></p> <ul style="list-style-type: none"> <li>• If bribery has been made by an Officer, Employees or Business Associate on the Group’s behalf, the incident is reviewed by ABCC and reported to the authorities if the ABCC reasonably believes that the involvement of the authorities is required from investigation and law and regulations requirement or if it is justified by the results of the investigation.</li> <li>• If bribery has been made by an Officer, Employees or Business Associate, the contract or agreement should be reviewed and a decision made as to whether mitigation can take place or the employment or contract should be terminated.</li> <li>• Audit rights should be exercised when there is reasonable suspicion bribery has occurred and the Business Associate has not addressed concerns in a satisfactory manner.</li> <li>• All non-compliance with this Framework and/or relevant laws and regulations in relation to anti-bribery and corruption in any jurisdiction, if proven, shall be dealt with in accordance with <b>Part K – Dealing with Non-Compliance</b>.</li> </ul>
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## I) Review, Evaluation and Continuous Improvement

**Review, evaluation and continuous improvement** aims at reviewing the effectiveness of the ABCM in managing bribery and corruption risks for corrective actions and management responses to enhance its current management and for continual improvement initiatives.

At regularly scheduled intervals, the ABCC shall compile and report to the Group Managing Director and subsequently update the Audit Committee on the followings:

1. Compliance of ABC Commitment, Policy and Procedures by all Officers, Employees and Business Associates;
2. Non-compliance of Officers, Employees and Business Associates on on-boarding procedures;

3. Identification of transactions, Employees and Business Associates with more than low bribery and corruption risk (with justification of its acceptance) and mitigation implemented and/or to be implemented;
4. Non-compliance of risk assessment and internal control procedures;
5. Incidents reported and its resolutions and responses;
6. Incidents reported via ABCM's incident-reporting channel and its resolutions and responses;
7. Results of continuous monitoring, summary of results of monitoring, its findings and weaknesses, its mitigation plans and recommendation for continuous improvement initiatives; and
8. The progress of mitigation plan and improvements to be made as presented in the previous reporting.

The Group Managing Director and the Audit Committee shall, upon receipt of the above reports and information, together with the audit report from the internal auditor and the advice and recommendation from the ABCC, review the relevance and adequacy of the ABC Commitment and ABC Policy as well as the adequacy and effectiveness of the ABCM and shall formulate mitigation plans and improvement programmes based on the results of the review on quarterly basis and as and when required.

## **J) Internal Audit**

The purpose and scope of work of the internal audit is to assist the ABCC, Group Managing Director and the Audit Committee, through the execution of approved bribery risk-based internal audit plan, to determine whether the Group's governance, risk management and control processes in relation to bribery and corruption risks, as designed, represented and implemented by management, is adequate and effective in a manner to ensure bribery and corruption risk exposures are properly and adequately identified, assessed and managed in accordance with the relevant laws and regulations and ABCM.

The Internal Audit Function is outsourced to an external independent professional firm. The terms and requirements as well as oversight of the Internal Audit Function shall be governed by the Engagement Letter. The Internal Audit Function must observe the independence and objectivity in the performance of the audit and have the adequate required level of competency, resources and authority required to perform the internal audit effectively and efficiently and shall be able to obtain external professional's services at the cost of the Group in the performance of its work.

The Internal Audit Function shall be reporting directly to the Audit Committee with the Audit Committee to review the scope of coverage, internal audit plan, processes, the results of the internal audit assessments, investigation undertaken and whether or not appropriate action is taken on the recommendations.

Every audit plan proposed by Internal Audit Function to Audit Committee shall cover the adequacy and effectiveness of the ABCM, bribery and corruption specific objective or business process specific with bribery and corruption risk considerations in that particular section.

The Internal Audit Function shall have the right to report any breach of applicable laws and regulations to the relevant regulatory body which had not been satisfactorily resolved subsequent to its reporting to the Audit Committee.

## **K) Dealing with Non-Compliance**

Any Officers, Employees and Business Associates found to be in non-compliance with the policies, procedures and requirements of this Framework or non-compliance with relevant laws and regulations in relation to anti-bribery and corruption in any jurisdiction, shall be subject to the following actions as determined appropriate, judging from the seriousness of the offence or non-compliance as determined by the relevant authorised personnel:

1. Warning Letter/Show Cause Letter;
2. Suspension from works or contract;
3. Penalty and/or damages in relation to the non-compliance or offences;
4. Demotion after going through proper due enquiry or investigation process, as the case maybe;
5. Dismissal after going through proper due enquiry or investigation process, as the case maybe;
6. Termination of contract in accordance with the terms of the contract.

In addition, the Board shall:

1. terminate and withdraw from the project, transaction or contract concerned if the non-compliance or offences are not satisfactorily resolved, corrected and/or addressed or may modify the Group's involvement in the project, transaction or contract if such non-compliance or offences are satisfactorily resolved, corrected and/or addressed in part in the opinion of the Group Managing Director and/or the Board;
2. repay or reclaiming any improper benefit obtained or paid, as the case maybe;
3. as soon as practical, report to the relevant and competent authorities in relevant jurisdiction on the non-compliance or offences as required under relevant laws and regulations for such jurisdiction; and
4. if bribery has occurred, taking action to avoid or deal with any possible consequent legal offences and be co-operative with the investigation carried out by relevant and competent authorities on the non-compliance or offences.

## **L) Training and Communication**

### **i) ABCC**

In order to equip the personnel performing ABCC's function and responsibilities with the comprehensive knowledge of the laws and regulations in relation to anti-bribery and corruption in relevant jurisdiction and adequate procedures for prevention of anti-bribery and corruption, the following training will be provided:

1. Upon appointment to the role of ABCC, comprehensive training on the laws and regulations in relation to anti-bribery and corruption in relevant jurisdiction and the adequate procedures for prevention of anti-bribery and corruption;

2. As and when there are changes in the laws and regulations and there are latest developments on the adequate procedures on anti-bribery and corruption, training/seminar on the changes in the laws and regulations in relation to anti-bribery and corruption in relevant jurisdiction and the adequate procedures for prevention of anti-bribery and corruption and latest development on the adequate procedures; and

## ii) Officers & Employees

The core purpose of **Communications and Training** is to communicate clearly and accessibly to all Officers and Employees the importance it attaches to countering bribery and corruption, the ABC Commitment, ABC Policy and ABCM of the Group, the bribery risks and damages, the ways it expects all Officers and Employees to act and how to recognise and deal with particular bribery and corruption risks, the Officers and Employees' roles and responsibilities in ABC, the implication and consequences of non-compliance with ABC Commitment, ABC Policy and ABCM of the Group. All Officers and Employees shall be provided with a copy of the ABC Policy by Human Resource Department upon employment and any amendment thereof thereafter, either in hardcopy form or via email or via download from intranet/corporate website.

Training on ABC by the Group	Upon appointment, changes in ABC Commitment, ABC Policy or ABCM and the Group's Code of Ethics and Conduct, any tailored communications materials (e.g. business conduct guidelines for higher than low risk job functions), ABC Commitment, ABC policy and procedures, ABCM, the bribery risks and potential impact, the bribery incidents (including how to recognise and prevent it) and responses required, incident reporting channel, whistleblowing policy and information on resources on ABC. For Employees with more than low bribery risks, to include expectation and contribution to the effectiveness of ABCMS, include benefits of improved ABC performance and of reporting suspected bribery.
Refresher Training	Once every three (3) years or as and when the Head of Human Resource or ABCC deem fits
Continuous Awareness	Notice of ABC Commitment and ABC Policy in strategic locations, and internal communication channels (such as email communication)
Tone-from-the-Top	Top Management communicates and emphasizes on the ABC commitment to all Employees
Frequency of commitment to comply with anti-corruption laws and ABC Commitment, ABC Policy or ABCM	Upon appointment and as and when the Head of Human Resource or ABCC deem fits

### iii) Business Associates

The Group shall communicate clearly and accessibly to Business Associates the importance it attaches to countering bribery and corruption, the ways it expects Business Associates' employees to act and how to recognise and deal with particular bribery and corruption risks.

Action	Low	Medium	High
Notification and evidence of notification	Upon appointment and request the counter party to acknowledge on the notification. HOD may request training from ABCC to business associate that he or she deals with as and when required		
Reminder on ABC commitment by the Group	Yes, upon document issued to the Business Associates (such as Purchase order and Quotation)		
Tone-from-the-Top	Top Management communicates and emphasizes on the ABC commitment to Business Associates		
			Suppliers to demonstrate that its Management has been notified on the Group's ABC commitment and will reinforce ABC commitment to all its employees