
ANTI-BRIBERY & CORRUPTION POLICY

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ANTI-BRIBERY & CORRUPTION POLICY

1 POLICY STATEMENT

- 1.1 It is our policy at Konsortium Bumi Group of Companies to conduct all our business in honest and ethical manner. We take zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.
- 1.2 All employees must not participate in any corrupt activity such as extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud, or money laundering.
- 1.3 Any employee who breaches this policy (or the spirit of this policy) will face disciplinary action, which could result in dismissal for gross misconduct. Konsortium Bumi Group of Companies therein, has the right to terminate the contractual relationship with such employee with immediate effect. Where a breach of this policy amounts to an offence under the **Malaysian Anti-Corruption Commission Act 2009 (“MACC Act”)** (Amended 2020), the employee concerned may face criminal prosecution.
- 1.4 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

2 WHO MUST COMPLY WITH THIS POLICY?

- 2.1 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, trustees, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives, business partners, sponsors and any other person associated with Konsortium Bumi Group of Companies.
- 2.2 In the context of this policy, third party refers to any individual or organization our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.
- 2.3 Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

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3 WHAT IS BRIBERY?

- 3.1 **Bribe** means a financial or other inducement or reward for action, which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit that is intended to influence a decision or action.
- 3.2 **Bribery** includes offering, promising, giving, accepting, or seeking a bribe.
- 3.3 **Corruption** means wrongdoing on the part of an authority through illegitimate and immoral means, which are incompatible with ethical standards or any form of abuse of power for business and/or personal gain and may include, but is not limited to, Bribery.
- 3.4 All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with the Group Managing Director or Head of Finance & Admin Department.
- 3.5 Specifically, you must not:
- (a) give or offer any payment, gift, hospitality or other benefit in the expectation or hope that a business advantage will be received in return, or to reward any business received;
 - (b) accept any offer from a third party that you know, or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
 - (c) give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
 - (d) engage in any other activity that might amount to Bribery or Corruption or otherwise lead to a breach of this policy.
- 3.6 You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

4 GIFTS AND HOSPITALITY

- 4.1 This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.
- 4.2 A gift or hospitality will not be appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

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- 4.3 Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret. Gifts must be given in the company's name not individual name.
- 4.4 Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers, and business partners.

5 RECORD-KEEPING

- 5.1 You must declare and keep a written record of all hospitality or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.
- 5.2 As good practice, gifts given and received should always be disclosed to the compliance manager. Gifts from suppliers should always be disclosed.
- 5.3 All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

6 POLITICAL CONTRIBUTIONS

- 6.1 Will not make donations, whether in cash, kind, or by any other means to support any political parties or candidates. We recognize this may be perceived as an attempt to gain an improper business advantage.

7. CHARITABLE CONTRIBUTIONS

- 7.1 Accepts (indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.
- 7.2 Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.
- 7.3 We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the compliance manager.

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9 EMPLOYEE RESPONSIBILITIES

- 9.1 As an employee of Konsortium Bumi Group of Companies, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.
- 9.2 All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.
- 9.3 If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the compliance manager.

10 HOW TO RAISE A CONCERN

- 10.1 If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption, or other breach of this policy has occurred or may occur, you must notify the Group Managing Director or the Compliance Manager at as early stage as possible.
- 10.2 Employees will be familiarized with whistleblowing procedures during the induction so they can vocalize their concerns swiftly and confidentially when they encounter such situation.

Compliance Manager:



SPENNY ANAK INGOK
Head Of Department – Finance & Admin

Authorized by:



DATO IR JANANG ANAK BUNGSU
Group Managing Director

Updated: 17 January 2022