



PRESTAR RESOURCES BERHAD

(123066-A)

PRESTAR RESOURCES BERHAD

Anti-Bribery & Anti-Corruption

POLICY & GUIDELINES

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Abbreviations

In this Policy & Guidelines, the following abbreviations shall have the following meaning unless otherwise stated:

ABAC	Anti-Bribery and Anti-Corruption		GHR	Group Human Resources & Administration Manager / Assistant General Manager / General Manager
BOD	Board of Directors		HR	Human Resource
CoC	Code of Conducts for Working Practice		LOA	Limit of Authority
CSR	Corporate Social Responsibility		MACC	Malaysian Anti-Corruption Commission
ERM	Enterprise Risk Management		RMC	Risk Management Committee
GMD	Group Managing Director		SSM	Suruhanjaya Syarikat Malaysia

1.0 Objectives

1.1. General Information

The Anti-Bribery & Anti-Corruption (“ABAC”) Policy & Guidelines (hereinafter referred to as “Policy & Guidelines”) defines the policies and procedures for Prestar Resources Berhad (“Prestar”) and its subsidiaries (collectively known as “Prestar Group” or “the Group”). Rules (including Circulars and Letters) from the regulators shall automatically supersede the existing operating policies and procedures herein stated.

The Policy & Guidelines are applicable to the following stakeholders:

- a. Directors of Prestar, both executive and non-executive, unless otherwise stated in this Policy & Guidelines;
- b. every employee within the Group; and
- c. suppliers, sub-contractors, consultants, agents, representatives and others performing work or services for or on behalf of the Group.

It is the intention of Board of Directors (“BOD”) of Prestar to ensure that these procedures serve as our commitment to prohibit bribery and corruption in the business conduct within the Group.

1.2. Policy & Guidelines Objectives

The main objectives of this Policy & Guidelines are as follows:

- To ensure the policies and guidelines / practices are oriented towards embedding ABAC stance organisation wide, with guidance from Guideline on Adequate Procedures and requirements of Malaysian Anti-Corruption Commission (“MACC”) Act 2009, introduced via Section 4 of the MACC (Amendment) Act 2018;
- To ensure adequate and standardised ABAC policies and guidelines are consistently applied throughout the Group by all relevant staff; and
- To ensure that business operations within the Group are strictly adhering to the ABAC Policy & Guidelines.

2.0 Key Definition

2.1. Anti-Bribery and Anti-Corruption Policy & Guidelines

This refers to the ABAC Policy & Guidelines established by Prestar.

2.2. Bribery

ISO 37001:2016 defines bribery as offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person’s duties.

2.3. Board of Directors

This refers to as the BOD of Prestar.

2.4. Code of Conducts for Working Practice

This refers to as the formalised work and business ethics enforced within the Group.

2.5. Corporate Hospitality

This refers to any considerate care of guests offered in the manner that complete expenses are borne by the company itself. This includes refreshments, accommodation and entertainment at a restaurant, hotel, club, resort and other venue.

2.6. Corruption

The MACC Act 2009 defines corruption as the act of giving or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to his/her job description.

2.7. Donation

This refers to the gift given out by the Group for charity, humanitarian aid or to support local community welfare, whether in-kind or by way of financial contribution.

2.8. Employee

This refers to any person who is in the employment of the Group, but not limited to executives and non-executives, contract employees.

2.9. Extortion Payment

This refers to money that is forcibly extracted from the Group or its employee by real or perceived threat to health, safety and liberty and is outside the scope of ABAC.

2.10. Facilitation Payment

This refers to illegal or unofficial payment made in return for services that the Group is legally entitled to receive without making such payment. For example, a payment made to government official or a person with certifying/ approval function to expedite the necessary action in the capacity of abovementioned person.

2.11. Gift

This refers to items given by the Group to a third party without the expectation of payment or benefit in return. For example, voucher, gift cards, Company branded product or promotional items, hamper, and festive gifts (i.e. mooncake, mandarin orange).

2.12. Group Managing Director

Defined as the highest-ranking executive in a company, responsible for carrying out corporate policies established by the Board, acting as the main point of communication between the BOD and corporate operation.

2.13. Guideline on Adequate Procedure

This refers to the document issued by the Prime Minister's Department in December 2018, pursuant to Section 17A (4) and (5) of the MACC Act 2009.

2.14. ISO 37001:2016

This refers to the international standards on requirements and guidance for establishing, implementing, maintaining, reviewing and improving an anti-bribery management system.

2.15. Limits of Authority

This refers to the approved documents stipulating the approving authority and authority limits allowed for the Board and management at Prestar.

2.16. Management

This refers to the management team of the Group, includes all Senior Management and Heads of Department.

2.17. Risk Management Committee

This refers to the Risk Management Committee ("RMC") of Prestar, providing oversight of ERM and corruption risk assessment of the Group.

2.18. Sponsorship

This refers to support, either financially or by way of product and/ or services for an event or activities organised by a profit/ non-profit organisation, local communities, government departments or agencies, primarily aimed at raising awareness about the Group profile.

2.19. Whistleblower

This refers to a person (internal or external) raising or reporting concerns of wrongful activities or wrongdoings as defined in the Whistleblowing Policy & Guidelines Document of Prestar.

2.20. Whistleblowing Policy & Guidelines

This refers to the Whistleblowing Policy & Guidelines of Prestar, applicable to the Group.

3.0 Responsibility

3.1. Board of Directors

- a. Sets commitment towards prohibition of bribery and corruption in the business conduct within the Group;
- b. Approves the ABAC Policy & Guidelines;
- c. Ensures the alignment of ABAC Policy & Guidelines to the strategy of the Group;
- d. Maintains oversight on ABAC governance, ensuring that best practices of ABAC management system is established, implemented, maintained and reviewed to adequately address the Group's bribery and corruption risks, including the Policy & Guidelines; and
- e. Promotes appropriate ABAC culture within the Group.

3.2. Group Managing Director

- a. Provides overall direction on the establishment, implementation and periodic review of ABAC Policy & Guidelines;
- b. Ensures the integration of ABAC Policy & Guidelines requirements into key organisation functions such as human resource management, procurement and finance, and enhance the underlying controls on these key functions so as to support ABAC Policy & Guidelines requirements;
- c. Supports the resource allocation and investment in a robust and effective ABAC Policy & Guidelines;
- d. Supports adequate training and awareness programmes for the employees of the Group;
- e. Communicates on the ABAC Policy & Guidelines, both internally and externally;
- f. Promotes appropriate ABAC culture within the Group; and
- g. Support other relevant management personnel in preventing and detecting bribery and corruption.

3.3. Group Human Resources

- a. Ensures that the ABAC Policy & Guidelines are adhered to within the Group;
- b. Reports on non-compliance cases to the RMC, including follow-up action status on the said cases;
- c. Attends to inquiries about Prestar's ABAC Policy & Guidelines and its practices within the Group; and
- d. Facilitates the corruption risk assessment periodically.

3.4. Employee

- a. Executes the ABAC Policy & Guidelines, including enhancement of underlying controls on affected functions under his/ her responsibility, as elaborated in this Policy & Guidelines;
- b. Adheres to the requirement of the ABAC Policy & Guidelines; and
- c. Reports on suspected bribery or corruption via the whistleblowing channel of Prestar.

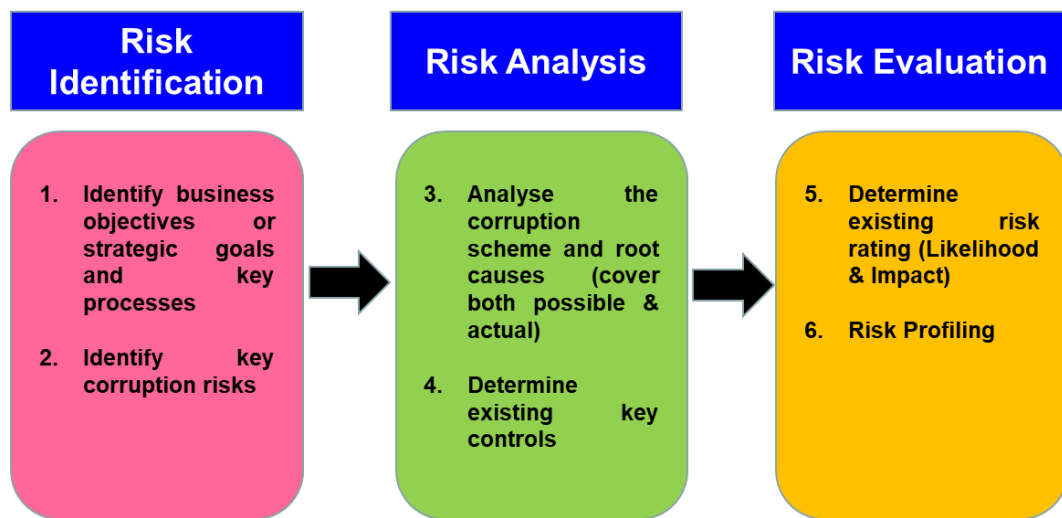
3.5. Amendments to Policy & Guidelines

If there is any requirement to update, improve, and / or amendments made to this Policy & Guidelines, proposed changes shall be submitted for authorisation and for approval by

the BOD. Key information on addition of new policy / procedure and deletion or variation of existing policy / procedures shall be indicated for version control purpose.

4.0 Corruption Risk Assessment Approach

- a. Prestar had established a Corruption Risk Management Framework guided by ISO 37001:2016 and Guidelines on Adequate Procedures. The framework outlines the governance, structure and policies, assessment process, and integration of risk management into the Group operations activities to promote continuous monitoring on the corruption risk identified. The corruption risk assessment process is depicted in the diagram below:



- b. The BOD, through the RMC, shall oversee and ensure accountability of corruption risk identified with the corresponding controls to be implemented.
- c. The risk parameters (i.e. financial impact, customer relationship and reputation / media) are established to estimate the consequences of a risk, namely likelihood of occurrence and criticality of impact, based on Prestar's risk appetite.
- d. Risk Register is developed to capture potential corruption scheme(s), possible root causes, existing key controls and impact are maintained for the Group. The risks are then evaluated based on the likelihood of occurrence and criticality of impact (i.e., Low, Medium, High and Extreme) to provide a basis for Management in strategic decision-making process and mitigation of corruption risks.
- e. RMC of Prestar shall conduct regular risk assessment i.e. on an annual basis and/or when there is a change in law or circumstance of the business to ensure the identified corruption risks are remains relevant and adequate mitigating controls are discussed and implemented.
- f. Specific anti-corruption plan shall be identified by the respective Heads of Department and reported to the GMD / GHR for review and monitoring.

5.0 Gift and Corporate Hospitality

Prestar recognises the importance of gift and corporate hospitality giving/ acceptance, donation and sponsorship activities to maintain good rapport with its vendors, customers and government officials. The policies and procedures set out below are to safeguard the Group's reputation and to protect its employee from allegation of soliciting bribe, corruption or exercising undue influence on external party(s) for personal gain.

5.1. "No Gift" Policy

- a. Prestar has adopted a "No Gift" policy whereby, subject only to certain narrow exceptions, Prestar employees and directors (executive and non-executive), family members or agents acting for or on behalf of Prestar employees, directors or their family members are prohibited from, directly or indirectly, receiving or providing gifts.
- b. Prestar requires all employees and directors to abide by this policy to avoid conflict of interest or the appearance of conflict of interest for either party in on-going or potential business dealings between Prestar and external parties as a gift can be seen as a bribe that may tarnish Prestar's reputation or be in violation of anti-bribery and corruption laws.

It is the responsibility of employees and directors to inform external parties involved in any business dealings with Prestar that the Company practices a "No Gift" policy and to request the external party's understanding for and adherence with this policy.

5.2. Exceptions to "No Gift" Policy

Although generally Prestar practices a "No Gift" policy, there are certain exceptions to the general rule whereby the receiving and provision of gifts are permitted in the following situations:

- 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 said gift is treated as company property);
- Gifts from company to external institutions or individuals in relation to the company's official functions, events and celebrations (e.g. commemorative gifts or door gifts offered to all guests attending the event);
- Gifts from Prestar to employees and directors and/or their family members in relation to an internal or externally recognised Company function, event and celebration (e.g. in recognition of an employee's/director's service to the Company);
- Token gifts of nominal value normally bearing the Prestar or company's logo or (e.g. t-shirts, pens, diaries, calendars and other small promotional items) that are given out equally to members of the public, delegates, customers, partners and key stakeholders attending events such as conferences, exhibitions, training, trade shows etc. and deemed as part of the company's brand building or promotional activities; and

- Gifts to charitable organisations or the equivalent who have no business dealings with Prestar (e.g. monetary gifts or gifts in-kind to charitable organisations).

5.3. Purchase of Gift and Corporate Hospitality

- a. Purchase requisition pertaining gift and corporate hospitality for the private sector shall be a reasonable amount. Such gifts and corporate hospitality shall fulfil **ALL** the following conditions prior to approval:
 - i. They are intended to maintain good rapport with the vendors/ customers of the Group;
 - ii. They are limited, customary and lawful under the circumstances;
 - iii. They do not have or perceived to be affecting action(s) or decision(s) of the receiving party;
 - iv. There shall be no expectation of any specific favour, benefit or advantages from the intended recipients;
 - v. There shall not be any corrupt/ criminal intent; and
 - vi. The giving out of gift or corporate hospitality shall be transparent.
- b. Any purchase of **gift** or **corporate hospitality** [*subject to the fulfillment of condition as stipulated in Clause 5.2 and Clause 5.3(a)*] requires approval based on the *Limits of Authority SOP* of Prestar.
- c. Approval from the authorised personnel can be arranged through telephone messages / emails or formal requests. The records must be kept and maintained by the Accounts and/or HR department.
- d. Purchase requisition pertaining to gift and corporate hospitality for government official from the public sector, it shall be restricted to statutory limit of the respective countries. However, gift in the form of cash or cash equivalent shall never be given or offered to any public or government officials.
- e. Purchase requisition on gift or corporate hospitality shall follow the basic principles of transparency declaration and be recorded. **ALL** gifts and corporate hospitality to be given, shall be recorded in the Gift & Corporate Hospitality Register, indicated with the purpose of requisition, including client or vendor name or representative details.
- f. In the event of any dispute between any internal practice, existing policy and or procedure already imbedded within the constitution of the organisation prior to the commencement of this ABAC Policy & Guidelines. All disputes on **limits** set in Section 5 of this ABAC Policy & Guidelines shall prevail over all other documentation.

5.4. Gift Acceptance

- a. Under no circumstances that an employee of the Group shall receive or soliciting for personal gift from an external party.
- b. Although the general principle is to immediately refuse or return such gifts, accepting a gift on behalf of Prestar is allowed only in very limited circumstances, whereby refusing the gift is likely to seriously offend and may sever Prestar's business relationship with the Third Party. However, in no circumstances may an

employee, director or his/her family/household members accept gifts in the form of cash or cash equivalent.

- c. Any gifts received by an employee of the Group shall be subjected to approval from the following appropriate authorised personnel as stipulated in Clause 5.3(b). The limits per transaction shall be restricted to the value of gifts received by vendors / agents / customers.
- d. **ALL** gifts received from external party(s) requires declaration to the Human Resource (“HR”) Department using the Gift & Corporate Hospitality Register, and report to GMD every six months or a shorter period, if the need arises for his review.

5.5. Corporate Hospitality Acceptance

- a. Employees of the Group shall exercise proper care and judgment prior to accepting entertainment from external party. This is vital to safeguard the Group’s reputation and to protect its employee from allegation of soliciting bribe or corruption.
- b. Any corporate hospitality received by an employee of the Group shall be subjected to approval from the following appropriate authorised personnel as stipulated in Clause 5.3(b). The limits per transaction shall be restricted to the value of corporate hospitality received by vendors / agents / customers.
- c. **ALL** corporate hospitality received from external party(s) requires declaration to the HR Department using the Gift & Corporate Hospitality Register, and be reviewed by the GMD every six months or a shorter period, if the need arises for his review.

6.0 Corporate Social Responsibility

- a. Given the nature of Prestar’s business, government agencies or local authority bodies may request for sponsorship and/ or donations in respect of CSR events. As part of Prestar’s commitment to corporate social responsibility and sustainable development, as a general matter, Prestar provides such assistance in appropriate circumstances and in an appropriate manner.
- b. Such requests shall be examined for legitimacy and not be made to improperly influence a business outcome. The proposed recipient shall be a legitimate organisation and appropriate due diligence shall be conducted in particular to ascertain whether any public officials are affiliated with the organisation. Any red flags shall be resolved before committing any funds to the programme. Even requests determined to be legitimate shall be carefully structured to ensure that the benefits reach their intended recipients.
- c. If any employees or Directors are in any doubt as to whether a charitable contribution or social benefit is appropriate, Management shall seek legal consultation accordingly.

6.1 Donation and Sponsorship

- a. The Policy & Guidelines, in accordance with Prestar’s commitment to contribute to the community coupled with its values of integrity and transparency, all sponsorships and donations shall comply with the following:
 - ensure such contributions are allowed by applicable laws;
 - obtain all the necessary internal and external authorisations;

- be made to well established entities having an adequate organisational structure to guarantee proper administration of the funds;
- be accurately stated in the company's accounting books and records; and
- not to be used as a means to cover up an undue payment or bribery;

Examples of red flags to look out for are as follows:

- The proposed recipient /organisation have affiliations with a Public Official or their relatives are involved;
 - The contribution is made on behalf of a Public Official;
 - There is a risk of a perceived improper advantage for Prestar; or
 - The proposed recipient is based in a high-risk country, the request comes from a high-risk country or the activity takes place in a high-risk country.
- b. Prestar requires employees to use good judgment and common sense in assessing the requests. When in doubt, employees shall seek for legal advice or escalate the matter to the GMD to determine the authenticity of such requests.
- c. **ALL** Corporate Social Responsibility (“CSR”) related sponsorships and donations shall be made in accordance with Prestar’s policies as stipulated in Clause 6.1(a) with prior approval based on the *Limits of Authority SOP* of Prestar.
- d. **ALL** donations and sponsorship payment shall be supported with an official letter of request from the requesting external party and proof of receipt.

7.0 Facilitation and Extortion Payments

- a. Facilitation payment to external party, in particular, government officials, is strictly prohibited as it is seen as a form of bribery and corruption. Extortion payment to external party, on the other hand, is not categorised as an illegal activity by legal means, as the health, safety and liberty of one is paramount.
- b. The GHR shall maintain a record of such event and report the payment to the relevant authority.

7.1. Facilitation Payment

- a. Facilitation payment to external party, in particular, government officials, is strictly prohibited as it is seen as a form of bribery and corruption, unless it can be proven that such payment is legitimate and supported by an official receipt.
- b. Facilitation payment shall not be in any way or form be disguised or translated in personnel remuneration package.
- c. Subject to the fulfilment of criteria in Clause 7.1(a), facilitation payment request may be approved by the GMD / GED.

7.2. Exception to Facilitation Payment (Extortion Payment)

- a. Extortion payment to any party shall not be made unless the employee(s) and or their families health, safety and or liberty are threatened.
- b. Subject to the fulfilment of criteria in Clause 7.2(a), extortion payment request may be approved by the GMD / GED.

8.0 Due Diligence Procedures and Dealing with External Parties

Prestar recognises the objective of due diligence procedures on customers, vendors and employees to evaluate the risk of bribery and corruption associated with these parties. This also serves as a basis for decision making, whether to accept or reject before entering into any contractual arrangement or business dealing.

Prestar Group shall require due diligence procedures to be applied on the key stakeholders below:

- i. Vendors or agents;
- ii. Customers; and
- iii. Employees.

8.1. Dealing with Vendors or Agents

- a. Prestar is committed to uphold the highest standard of ethics and integrity in all aspects of its procurement activities by:
 - i. Adhering to the procurement policies and procedures;
 - ii. Avoiding dealing with any vendor, sub-contractors, or agents who known or reasonably suspected of corrupt practices;
 - iii. Ensuring that all new vendors/ sub-contractors/ agents are subject to background assessment and conflict of interest check prior to registration and acceptance;
 - iv. Communicating the Policy & Guidelines requirements to vendor, sub-contractors or agents.
 - v. All contracts / agreement entered with vendors, sub-contractors or agents to incorporate a provision whereby Prestar retains right to audit third party compliance with the Policy & Guidelines; and
 - vi. All agents are required to acknowledge their adherence to the Policy & Guidelines requirements.
- b. The key components of vendor/ agent due diligence procedures cover the following but may vary depending on the circumstances:
 - i. Corporate profile;
 - ii. Company search via Suruhanjaya Syarikat Malaysia (“SSM”) or equivalent authorities in the respective countries of operation;
 - iii. Financial background;
 - iv. Directorship;
 - v. Past records of criminal, bribery or corruption cases; and
 - vi. Potential conflict with existing employees or Director of the Group.
- c. The results and/ or any concern raised during this due diligence assessment shall be communicated to and with approval from the GM/ED/GED/GMD, whichever is applicable for the relevant company prior to entering into the relationship.

8.2. Dealing with Customers

- a. In ensuring that Prestar dealings with its customers complies with relevant rules, regulations and the Policy & Guidelines requirements, the safeguard procedures below are required:

- i. All new customers are subject to background assessment and conflict of interest check prior to entering into a business dealing; and
 - ii. A standard ABAC clause shall be included in all contracts / agreement entered with customers to enable the Company to terminate the contract in the event of any proven bribery or corruption activities.
- b. The key components of customers due diligence procedures cover the following but may vary depending on the circumstances:
- i. Corporate profile;
 - ii. Company search via SSM or equivalent authorities in the respective countries of operation;
 - iii. Financial background;
 - iv. Directorship;
 - v. Past records of criminal, bribery or corruption cases; and
 - vi. Potential conflict with existing employees or Director of the Group.
- c. The results and/ or any concern raised during this due diligence assessment shall be communicated to the GM/ED/GED/GMD, whichever is applicable for the relevant company prior to entering into the relationship.

8.3. Dealing with Public Officials

A 'public or government official' is defined as; which includes, without limitation, candidates for public office, officials of any political party, and officials of state-owned enterprises other than Prestar. Caution shall be exercised when dealing with public officials. Providing gift, entertainment or corporate hospitality to public officials or their family/ household members is generally considered a 'red flag' situation in most jurisdictions.

Prestar shall not provide non-business travel and hospitality for any government official or his/her family/household members without permission from the GM/ED/GED/GMD whichever is applicable for the relevant company and advice from lawyer, of necessary.

Prestar's policies and procedures on gift, entertainment and corporate hospitality shall also be abided by, copies of which can be obtained from the Company's website or HR Department.

If approval is given to provide gift, entertainment or corporate hospitality to public officials, the Management shall ensure that the value of gift, entertainment or corporate hospitality shall not exceed the statutory limit.

8.4. Dealing on Recruitment of Employees

- a. Background screening on shortlisted candidate(s) is required during the evaluation stage of recruitment process.
- b. Key considerations prior to acceptance of shortlisted candidate(s) cover the following:
 - i. Past criminal records (if any);
 - ii. Potential fraud, bribery or corruption committed in the previous organisation;
 - iii. Verification of past employment or institution of learning references, where applicable; and

- iv. Conflict of interest, i.e. relationship with any employee, vendor, customer or Director of the Group.
- c. Recruitment due diligence result shall be vetted by the GM/ED/GED/GMD, whichever is applicable for the relevant company, prior to acceptance of the candidate.
- d. Newly recruited employee(s) shall be provided with an onboarding programme, including the briefing on Prestar's ABAC Policy & Guidelines and CoC. The employee is also required to declare on their adherence to the ABAC Policy & Guidelines requirements via **Appendix A for Employee ABAC Declaration Form**.

9.0 Reporting Procedures on Suspected Bribery or Corruption Activities

Reference shall be made to the *Whistleblowing Policy & Guidelines Document* pertaining to reporting procedures on suspected bribery or corruption activities.

Whistleblowers are encouraged to report in good faith or to raise a concern about any attempted, suspected and actual bribery or corruptions activities that violates to the Policy & Guidelines at the earliest possible stage.

Upon making a disclosure in good faith, based on reasonable grounds and in accordance with the procedures pursuant to the *Whistleblowing Policies & Guidelines Document*, the whistleblower shall be protected from any form of retaliation within the Group.

9.1. What to Report

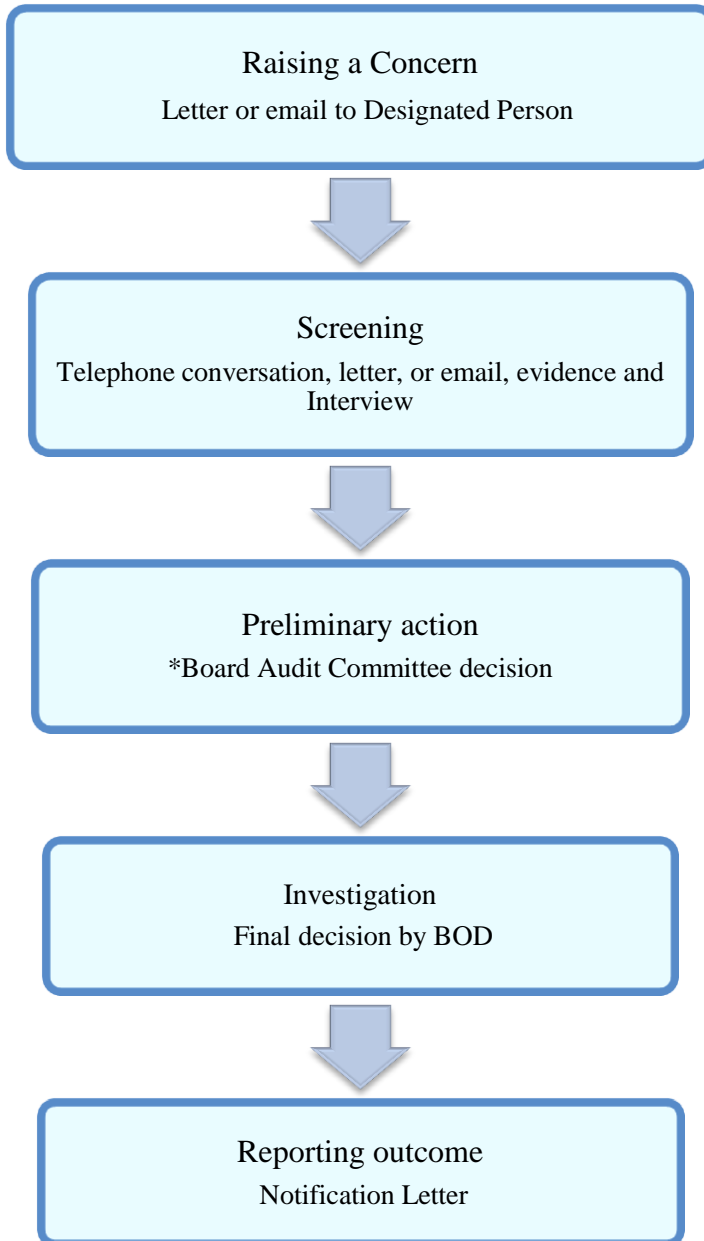
The key information or documents below are to be provided by the whistleblower to facilitate further investigation, if required:

- a. Whistleblower's contact information
 - i. Name (*)
 - ii. Designation
 - iii. Contact Number
 - iv. Email Address (*)
- b. Suspect's information
 - i. Name
 - ii. Designation
 - iii. Contact Number
 - iv. Email Address
- c. Complaints / concerns
 - i. Incident date
 - ii. Affected parties
 - iii. Incident or event location
 - iv. Supporting documents (where applicable)
 - v. Other details or information which may assist the investigation

* *May leave the information blank if the whistleblower wishes to remain anonymous*

9.2. How to Report

Whistleblowers shall report their concerns using the reporting channels as stated in the *Whistleblowing Policies & Guidelines Document*, which is available on the Company's website.



10.0 Internal / External Assessment

- a. As part of the internal monitoring process, GHR shall review the underlying controls of ABAC and identify any non-compliance incidences on a regular basis.
- b. If any of Prestar Group's key stakeholders as defined in Clause 8.0 are found to have breached any ABAC rules and regulations or this Policy & Guidelines, such breach may result to the following actions taken:

Key stakeholders	Actions taken
Employee	Disciplinary action by Prestar Group in accordance with the CoC of Prestar which includes termination of employment.
Vendor/ agents/ customers	<ol style="list-style-type: none"> i. Subjected to BOD's approval, retain business dealings; ii. Discontinue business dealings with immediate effect; iii. Termination of contract with immediate effect; or iv. Legal proceedings if required.

11.0 Training and Awareness Programme

- a. Annual training and awareness programme on ABAC shall be provided to Prestar's employees and key stakeholders as defined in Clause 8.0, as appropriate to their roles and taking into account the bribery risk assessment.
- b. Updates on this Policy & Guidelines with regards to its content as well as regulatory requirement affecting the ABAC practices shall be communicated to Prestar's employees and key stakeholders, defined in Clause 8.0.

12.0 Appendices

Appendix A - Employee ABAC Declaration Form

Employee's ABAC Acknowledgement

I,
hereby acknowledge receipt of the Group's and the Group's Anti-Bribery and Anti-Corruption Policy and have read its contents.

It is my understanding that the Anti-Bribery and Anti-Corruption Policy contains guidelines, policies and best practices of the Group covering some of our most important individual responsibilities and obligations as we go about our work and I confirm that I will abide by the Policy and the MACC Act.

Signature : _____

Full Name : _____

Designation : _____

Date : _____

The signed original copy of this acknowledgement form shall be kept inside each employee's Personal File.

This Policy is the property of the Group and shall be shared via all Group electronic media and hard copy will be place at all notice board and General Office for any employee to refer to.