

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

POLICY STATEMENT

HARTAMAS is committed to conducting business ethically and honestly, and has zero-tolerance for bribery and corrupt activities. We are committed in all business dealings and relationship and will constantly uphold all laws relating to anti-bribery and anti-corruption in Malaysia, in particular, the Malaysia Anti-Corruption Commission Act 2009.

SCOPE OF POLICY

The principles and obligations outlined in this policy apply to all employees of HARTAMAS, Board of Directors, and HARTAMAS's stakeholders, which include customers, vendors, agents, consultants, outsourced personnel and other representatives.

This policy sets forth HARTAMAS minimum compliance standards concerning interactions with third parties. However, where local law and regulations require more stringent controls, then such stricter controls must be followed.

DEFINITION OF BRIBERY

A bribe refers to “offering, promising, giving or soliciting of 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” as defined by the Anti Bribery Management System ISO 37001.

FIGHTING BRIBERY, CORRUPTION AND UNETHICAL PRACTICES

Solicitation, Bribery and Corruption

Employees are prohibited from, directly or indirectly, soliciting, accepting or obtaining or agreeing to accept or attempting to obtain, from any party for themselves or for any other party, any bribe or gratification as an inducement or a reward for doing or forbearing to do, or for having done or forborne to do, any act in relation to HARTAMAS's affairs or business, or for showing favour or forbearing to show disfavour to any party in relation to HARTAMAS' affairs or business.

Receiving Facilitation Payments

Employees are prohibited from, directly or indirectly, accepting or obtaining or attempting to accept or obtain facilitation payments from any person for themselves or for any other person subject to this policy. The term “facilitation payments” generally means payments made to secure or expedite the performance by a person performing a routine or administrative duty or function.

Prohibition on Commissions, Discounts and Secret Profits

Employees must not, directly or indirectly, receive or obtain, in respect of any goods or services purchased or other business transacted (whether or not by them) by or on behalf of HARTAMAS, any discount, rebate, commission, service, interest, consideration of value or other benefit or payments of any kind (whether in cash or in kind) which is not authorised by HARTAMAS's policies or procedures.

Receiving Gifts and Entertainment

Employees are required to comply with the SOP or any other policy and procedures relating to the receipt of gifts and entertainment.

Political Contributions, Sponsorships and Donations**a) Political Contributions**

HARTAMAS does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office.

b) Sponsorships and Donations

- i. Employees must ensure that all sponsorships and donations are not used as a subterfuge for bribery or used to circumvent or avoid any of the provisions of the SOP, including in particular, the prohibition on bribery.
- ii. In accordance with HARTAMAS's commitment to contribute to the community coupled with its values of integrity and transparency, all sponsorships and donations must comply with the following:
 - Ensure such contributions are allowed by applicable laws;
 - Obtain all the necessary approval/ authorisations;
 - Be made to well-established entities with an adequate organisational structure to guarantee the 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;

Reporting of a Concern and Whistleblowing

Recognising the abovementioned values, HARTAMAS provides an avenue for all employees of HARTAMAS, members of the public and stakeholders to disclose any improper conduct within HARTAMAS.

All disclosures of improper conduct within HARTAMAS are to be channelled in accordance with the established HARTAMAS's Whistleblowing Policy.

From the management