

Anti-Bribery and Corruption Policy

Why do we have this Policy?

Malaysian Pacific Industries Berhad and its subsidiaries (“**MPI Group**”) commit to conducting business ethically in compliance with all applicable anti-bribery and corruption laws of every country in which MPI Group operates.

MPI Group does not condone any form of bribery and corruption. This Anti-Bribery and Corruption Policy (“**ABC Policy**”) serves to provide guidance on how to prevent, deal with and combat bribery and corrupt activities and issues that may arise in the course of business.

Who does this Policy apply to?

This ABC Policy applies to all employees, directors (executive and non-executive) and any person who performs services for or on behalf of MPI Group, which includes contractors, subcontractors, consultants, suppliers, agents, intermediaries and representatives of MPI Group (collectively, “**Applicable Persons**”).

What must you NOT do?

Anti-bribery and corruption laws make it illegal for any person to:

- (a) give, promise or offer to give to any person, whether for the benefit of that person or of another person; or
- (b) solicit, receive or agree to receive for himself or for any other person,

any gratification as an inducement or reward to do or forbear from doing anything in respect of any matter or transaction, whether actual, proposed or likely to take place.

Accordingly, you shall not at any time:

- Offer, promise or *give anything of value* in order to obtain or retain any personal or business advantage.
- Request or accept *anything of value* that might influence your objectivity in carrying out your employment/business.

“Things of value” that could be perceived as bribery or corruption can take many forms (including monetary, services or in kind).

The laws on anti-bribery and corruption are very wide and cover activities carried out or merely offered, whether directly or indirectly.

For example, Mr. X is an employee in the Sales Department of one of the MPI Group companies and is charged with an offence for making improper payments to an official. Mr. X will be held liable if:

- *Carried out, offered, promised or agreed.* Mr. X made such improper payments, or merely offered to make such payment even though such payment was subsequently not made; it is enough that the payment was offered.
- *Directly or indirectly.* The improper payment was made by him directly to the official or through a third-party agent.

There is no difference whether the bribery or corrupt activity is carried out within or from Malaysia, or otherwise.

What are the penalties?

Engagement in any bribery or corrupt practices or activities will result in severe negative consequences. The Applicable Person may face dismissal, fines and imprisonment up to 20 years.

What else should you do?

All Applicable Persons are responsible for refraining from and preventing any instance of bribery or corruption, and for reporting any concern or suspicion so that MPI Group can identify the risks and conduct investigations as may be necessary. Reports of any concern or suspicion may be made to the Head of Internal Audit or Head of Human Resources:

Head of Internal Audit
Level 31, Menara Hong Leong
No. 6, Jalan Damanlela
Bukit Damansara
50490 Kuala Lumpur, Malaysia
Email: tehboonang@hongleong.com.my

or

Head of Human Resources
Level 31, Menara Hong Leong
No. 6, Jalan Damanlela
Bukit Damansara
50490 Kuala Lumpur, Malaysia
Email: LalitaAbdullah@hongleong.com.my

If you have any doubt, you should contact the Head of Internal Audit or Head of Human Resources immediately.

An electronic version of this ABC Policy is available at www.mpind.my.

[MPI ABC Policy adopted in Nov 2019 (v6.3.1)]