

# MUHIBBAH ENGINEERING (M) BHD AND ITS SUBSIDIARIES

## ANTI-BRIBERY AND CORRUPTION POLICY

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### 1. INTRODUCTION

The purpose of this Policy is to provide information and practical guidelines to the Directors and Employees of Muhibbah Engineering (M) Berhad (“**MEB**”) and its subsidiaries (collectively, “**the Group**”) to ensure that they adhere to all applicable laws, regulations and rules including the Malaysian Anti-Corruption Commission Act 2009 (including any amendments thereto) (“**MACC Act 2009**”) and the Group’s Code of Ethics, Business Practice and Conduct policies and procedures.

Bribery and Corruption are defined as the giving or receiving of an undue benefit, with the intention of influencing the judgement and decision of public officers, third parties or business partners for commercial advantage.

### 2. FACILITATION PAYMENTS

The Group shall not promise or offer, or agree to give or offer, facilitation payments to an officer of any public body (as defined in the MACC Act 2009) to secure or expedite the performance of a routine action by an officer of a public body.

However, there could arise exceptional circumstances in which the Directors or Employees have no alternative but to make a facilitation payment in order to protect themselves from injury, loss of life or liberty. Any request for facilitation payment under such circumstances should be reported immediately to the immediate superior or Head of Division/Department.

### 3. GIFTS, GRATUITIES, CORPORATE HOSPITALITY AND BUSINESS COURTESIES

This Policy does not prohibit normal gifts, corporate hospitality, festival courtesies, meals and refreshments, travelling expenses and gratuities (collectively referred to as “**Gratuities**”) which are fair and reasonable, bona fide, in accordance with the proper corporate authority limit, commensurate with the position and circumstances and common industry practice such as to foster goodwill and strengthen working relationships with stakeholders.

All such Gratuities must not be lavish and extravagant, inappropriately frequent and excessive with the intention of influencing the decision making and judgement of the stakeholders or recipient to obtain or receive favourable business benefits and advantage.

### 4. CONFLICTS OF INTEREST

A conflict of interest exists when a person has a private interest that is not for the betterment of the Group. In conflicting situations, the Directors or Employees concerned shall put the interests of the Group above personal interests.

Any conflict of interest or potential conflict of interest should be declared to the immediate superior or representative from the HR department and properly documented.

## **5. THIRD PARTY MANAGEMENT**

All third parties, including agents, suppliers, consultants and joint venture partners should be made aware of this Policy and the arrangements with them shall be subject to clear contractual terms, including specific provisions requiring them to comply with this Policy accordingly.

## **6. DONATIONS AND SPONSORSHIPS**

The Group may make Donations and Sponsorships provided that such donations and contributions are legitimate, bona fide and in compliance with proper approval limits and applicable laws and regulations.

## **7. WHISTLE BLOWING AND REPORTING**

The Group has a Whistleblower Policy that allows employees and members of the public who are aware of, or suspects a violation of the Policy to whistle blow and report in good faith their concerns through the mechanism set out under the Group's Whistleblower Policy. All reports shall be treated confidentially.

## **8. TRAINING AND COMMUNICATION**

Awareness and/or training programme on this Policy shall be provided to all Directors and Employees. All such training and communication records will be updated and kept by the Human Resource Department accordingly.

## **9. RECORD KEEPING**

Relevant information and records are to be properly kept and maintained for a reasonable period of time in accordance with prevailing laws and regulations.

## **10. REVIEW OF THE POLICY**

The Board will monitor compliance with the Policy and review the Policy regularly to ensure that it continues to remain relevant and appropriate.