

## **AMANAHRAYA ANTI-BRIBERY AND ANTI-CORRUPTION POLICY STATEMENT**

Amanah Raya Berhad and its subsidiaries ("AmanahRaya") are committed towards ensuring the highest-level of integrity, accountability, and professionalism in its business activities. AmanahRaya adopts a zero-tolerance approach against all forms of bribery and corruption in all our business dealings and relationships.

The AmanahRaya Anti-Bribery & Anti-Corruption Policy ("the Policy") was initiated based on the Guidelines On Adequate Procedures ("Guidelines") issued pursuant to Section 17A(5) of the Malaysian Anti-Corruption Commission Act ("MACC Act"), which sets out adequate procedures a commercial organisation needs to have in place as a defence to a corporate liability charge under Section 17A of the MACC Act 2009.

This Policy is applicable to all directors, employees and business partners of AmanahRaya and intended to supplement all the relevant applicable laws, rules, and other corporate policies and it is not intended to supersede any local laws.

### **ANTI-BRIBERY AND ANTI-CORRUPTION PRINCIPLES**

#### **Gifts**

AmanahRaya is adopting "NO GIFT POLICY" to avoid conflict of interest in ongoing or potential business dealings as it may tarnish reputation or be in violation of anti-bribery and corruption laws. Nevertheless, accepting or receiving a gift may be allowed only under limited circumstances that shall not influence a decision-making process.

#### **Conflict of Interest**

The Code Of Business Ethics and AmanahRaya Conflict of Interest Policy sets out the procedures on how to deal with conflicts of interests.

#### **Due Diligence**

AmanahRaya has established key considerations or criteria for conducting due diligence on any relevant parties such as directors, employees, agents, vendors, contractors, suppliers, and consultants or who may action the behalf of the AmanahRaya prior to entering into any formal relationships to mitigate bribery risks.

#### **Entertainment**

AmanahRaya's directors and employees may accept entertainment that is reasonable and moderate in the context of the business after our superiors are informed and that advances the company's interest.

#### **Corporate Social Responsibility**

Corporate Social Responsibility activities are done in good faith and are not aimed to gain any business or other advantage quid pro quo that may be considered improper