



Group Anti-Bribery and Corruption Policy

Introduction

ABM Fujiya Berhad and its subsidiaries (“the Group”) are committed to conduct business dealings with integrity in a fair, honest and transparent manner. The Anti-Bribery and Corruption Policy (“Policy”) of the Group is drafted in accordance with subsection 5 of Section 17A under the Malaysian Anti-Corruption Commission Act 2009 and the Malaysian Anti-Corruption Commission (Amendment) Act 2018.

Objective

As one of the core values of the Group is integrity, each employee should uphold high levels of personal and professional values in all business interactions and decisions. The Policy provides guidance on how to act when faced with potential bribery and corruption.

Scope

This Policy applies to all directors (executive and non-executive), employees (including permanent, part-time, probationary, contract) of the Group and any third parties (i.e agents, contractors, consultants, partners, representatives, vendors) who perform services for or on behalf of the Group.

Definitions

For the purpose of this Policy,

- Bribery means the act of giving or receiving ‘gratification’ in exchange for some kind of influence or action in return, that the recipient would otherwise not offer.
- Company means ABM Fujiya Berhad (200301025904/ 628324-W).
- Corruption is the abuse of entrusted power for personal gain. Essentially, it is 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.
- Facilitation Payment is a payment or other provision made to or received personally from a third party in control of a process or decision, in order to secure or expedite a routine or administrative duty or function.
- Gratification refers to “something of value” which includes, but not limited to money, donation, gift, loan, fee, reward, valuable security, information, property or interest in property, employment, appointment, release, forbearance, undertaking, promise, rebate, discount, services employment or contract of employment or services and agreement to give employment or render services in any capacity.
- MACC Act means the Malaysian Anti-Corruption Commission Act 2009 (including its amendments) and the Malaysian Anti-Corruption Commission (Amendment) Act 2018.
- Subsidiary/ subsidiaries refer to company/ companies in which ABM Fujiya Berhad has a controlling interest.



Anti-bribery and corruption statement

The Group does not tolerate all forms of bribery and corruption and shall continuously conduct its business activities ethically, honestly and with high standards of integrity.

Since the provisions in this Policy are based on legal requirements, violating this policy may subject individuals and the Group to penalties, including fines and imprisonment. Such violations may also severely damage the reputation of the Group and its related individuals. As such, all the individuals shall not, whether directly or indirectly, offer, give, receive or solicit any item of value, attempting to illicitly influence the decisions or actions of a person in a position of trust within an organisation, either for the intended benefit of the Group or the persons involved in the transaction.

The anti-bribery and corruption statement applies equally to the Group's business dealings with Government (public sector) and commercial (private sector) entities, and includes their directors, employees, agents, consultants, representatives and other appointed representatives such as officials, politicians and public bodies.

The Group shall also conduct due diligence on every individual, projects and major business activities including donations and sponsorship, in particular where there is significant exposure to bribery and corruption risk, in line with this Policy.

The Group encourages each individual to report any suspected, attempted or actual bribery and corruption cases, and prohibits retaliation against those making reports in good faith. The Group also provides assurance that no individual shall be penalised or suffer any adverse consequences in retaliation for refusing to pay or receive bribes or participate in other illicit behaviour.

Principles on anti-bribery and corruption

Conflict of interest

Conflict of interest may arise in situations where Individuals engage in business or other activities outside the Group or have personal interests, whether it benefits themselves or their closely related person(s), i.e. relatives or close associates, which competes or conflicts with the interests of the Group.

All Individuals shall declare their conflict of interest, both on a scheduled basis, and ad hoc as soon as they arise.

Gifts and hospitality

Acceptance of gifts and hospitality is allowed provided that gifts and hospitality received shall be modest in value and proportionate to the position. Individuals should not accept any gift or hospitality if it could be misconstrued as a reward, an inducement or other corrupt acts.



All individuals shall not offer or give a gift or hospitality if they are aware or suspect that it would be in breach of the rules of the organisation where the recipient works. The Group may give corporate gifts, i.e. bearing the Company's or the Subsidiary's logo/ identity and of nominal value for the purposes of promotions, branding or marketing.

Individuals may generally accept or offer gifts and hospitality only where they are infrequent, reasonable, unsolicited, and would not be perceived by others to improperly influence business decisions.

Entertainment

Entertainment could be considered as a bribe if it is given or received with the intention of influencing someone to act improperly, as a reward for having acted improperly or create a perception of expectation for certain outcomes beneficial to the business of the Group. Individuals are allowed to offer or accept entertainment and recreation, provided there is proper and reasonable justification. Entertainment activities shall be limited to only those individuals who have a legitimate business purpose.

Donations and Sponsorships

The Group allows charitable donations and sponsorships for legitimate reasons and as permitted by existing laws and regulations. However, the Group strictly prohibits the giving and receiving of donations and sponsorships in exchange for improper purposes that may affect the business of the Group.

All requests for charitable donations and sponsorships are subject to the approval of the executive director(s) and it must be done in a transparent manner for social and moral responsibility.

The Group may only make political contributions where such contributions are permitted under applicable law(s). The authority to approve such political contributions is with the board of directors of the Company; or the board of directors of the relevant subsidiary(ies). No political contribution by the Company or a Subsidiary shall be made with an intention to obtain or retain business or an advantage for the benefit of the Group or a Subsidiary.

Facilitation Payments

Facilitation Payments in expediting governmental processes are classified as acts of bribery and corruption under the MACC Act and are illegal. As such, the Group prohibits the giving, offering, or promising of Facilitation Payments of all kinds by any individual acting on behalf of the Group. All individuals are prohibited from receiving or requesting such payments whether in cash or in kind.



Recruitment, Promotion and Support of Individuals

The Group's recruitment, training, performance evaluation, remuneration, recognition and promotion for an individual shall be designed and regularly updated to recognise integrity. The Group shall not offer employment to prospective individual in return for having inappropriate favour to the Group.

Responsibilities of Employees

Employees are responsible for understanding and complying with this Policy. No excuses, exceptions or leniency will be acceptable for non-compliance of any domiciled laws and regulations where the Group conducts its businesses.

Training and Communication

This Policy is a public document which is published in our Company website and shall be communicated to all our employees and stakeholders. Our employees are required to understand the Company's position on anti-bribery and anti-corruption.

Adequate training on this Policy shall be provided to our employees. This Policy must be communicated to all the third parties without the limitation to customers, suppliers, contractors, consultants at the outset of our business relationship with them and as appropriate thereafter. The Group expects all these parties to have anti-bribery and corruption policies in place within their organisations or part of their work ethos which are consistent with this Policy.

Record-Keeping

Accurate and complete invoices, documents, and records of all the Group's transactions with third parties including customers, suppliers, and business contacts are to be maintained to ensure they conform to generally accepted and applicable laws and regulations.

Awareness and Compliance

The Group is committed to always comply with applicable laws, rules, and regulations of all relevant authorities in jurisdictions where it operates. Appropriate and reasonable measures shall be taken to ensure the Group complies with the Policy.

The Group regards bribery and acts of corruption as serious matters and will impose penalties in the event of non-compliance with this Policy. Non-compliance may lead to disciplinary action, up to and including termination of employment or contracts. Legal actions may be taken should the interests of the Group be impacted by such non-compliance.