

**HHRG BERHAD**  
**Company No. 201101041555 (969678-D)**  
**(Incorporated in Malaysia)**

**ANTI-CORRUPTION AND BRIBERY POLICY**

**1. Introduction**

This Anti-Corruption and Bribery Policy (ACBP) is to prevent the occurrence of corruption and bribery practice in relation to the businesses of the HHRG Berhad and subsidiary companies ("**Company**"). Company conducts its business in a legal and ethical manner. The Group will ensure its businesses or any transactions do not participate in corruption activity for its advantages or benefits.

**2. Objectives**

The main objective of the policy is to ensure that the Group established the necessary safeguards which should prevent any conduct of bribery or corruption from happening and how to recognise, and deal with corruption and bribery issues.

**3. Compliance to the Law**

The Group comply with all applicable law including the Malaysian Anti-Corruption Commission Act 2009 and the Malaysian Anti-Corruption Commission (Amendment) Act 2018 or any amendments thereto. In order to ensure compliance in accordance with amendments to Bursa Malaysia Securities Berhad ACE Market Listing Requirement ("ACE LR") in relation to Anti-Corruption Act 2009 pursuant to *Subsection (5) of Section 17A under the Malaysia Anti-Corruption Commission Act, 2009*.

**4. Responsibility**

This policy is applicable to Board of Director, Management and employee (either permanent, contract or temporary) of Company. This policy need to be read and understand clearly by the employee. Disciplinary action will be taken including termination of employment if violation of the policy.

**5. Definition**

Corruption is defined as abuse of position for personal gain or misuse of position to help others to improperly enrich themselves or a breach of trust in order to gain personal or other advantage. It can be in the form of cash and other forms



including non-cash gifts, lavish entertainment or hospitality, loans, fees or other reward or benefit.

## **6. Anti-Corruption and Bribery**

### **a. Prohibited. Gifts, Hospitality and Entertainment**

- The Company adopted a No-Gift, No-Hospitality and No-Entertainment Policy where the policy prohibits employees to receive gift or asking for (soliciting) gifts from external parties including customers, business partners, suppliers, regulators, and government officers:
- Gifts may be in the form of cash or cash equivalent, including gift certificates, loans, commissions, discounts services, advantage or any other benefit, which is not extended to all employees of Company; and
- Facilitation Payment. Usually small bribe payments (usually paid to low-level officials) made directly or indirectly to secure or speed up performance of a routine or to avoid bureaucratic delays and red tapes that may slow down certain business dealings.

b. In any case, employees must never pay, offer, solicit or receive bribes of any forms including facilitation payments, employee immediately notify immediate superior for consultation. For any above cases, the documents need to be shown to the immediate superior and to be kept properly.

c. In respect of political contributions, funds or resources of the Group must not be used to make any direct or indirect political contributions on behalf of the Group without approval from the Board of Director. Any appearance of making such contributions or expenditure to any political party, candidate or campaign, must also be avoided.

d. Donations in the form of charity may be permissible depending on the circumstance but should be made directly to an official entity and be able to be disclosed publicly when required to.

e. However, corporate gift and souvenirs which are given out of hospitality are exempted if the following criteria are met:

- The items are attached with company logo;
- The items are given to public (For example job fair, trade events, conference, et-cetera);
- By invitation where the invitation is not exclusive to one organisation or person and participation is transparent (For example industry meeting, event, shareholder meeting, et-cetera.): and
- The items are not concealed and are given equally to all participants attending the event without discrimination.



**7. Record Safekeeping**

All record should be in proper filing to be maintained with accuracy and completeness for all payments made to third parties in the ordinary course of business which is prove as evidence that such payments not linked to corrupt and/or unethical manner.

**8. Reporting**

Employees should report any cases of wrong doing or a violation of the Policy is encouraged to report using Whistle Blowing Policy (WBP). Employee produce genuine report on the violations or suspected violations will not discriminated against suffer any sort or manner of retaliation. Report will be treated confidentially. The frequency of reporting will be table at least one times a year and more frequent if it deems necessary.

**9. Review of The Policy**

The BOD will monitor compliance with the Policy and review the Policy at least once every 3 years to assess their effectiveness and ensure that it continues to remain relevant and appropriate. The BOD reserves the total rights to all amendments, deletions or augment any terms and conditions or any part of this policy when necessary including the use of an additional form, should there be a need to develop one.

**10. Staff Declaration**

All Company personnel shall certify in writing that they have read, understood and will abide by this policy. A copy of this declaration shall be documented and retained by the Human Resources Department for the duration of the personnel's employment. A sample declaration can be found in the **Appendix** of this Policy.

The Company reserves the right to request information regarding an employee's assets in the event that the person is implicated in any bribery and corruption-related accusation or incident.

**STAFF DECLARATION FORM**

I,....., hereby declare that I have read and understand Company's Anti-Bribery and Corruption Policy. I will abide by the requirements and provisions set out in the Policy, as required by my Employment Contract of Service.

I am fully aware of the consequences which may follow as a result of breaching the Policy.

.....

Name

Title

Date