

# GLENEALY PLANTATIONS SDN BHD

## Anti-Bribery & Anti-Corruption Policy

### 1. Policy Purpose

- 1.1 Glenealy Plantations Sdn Bhd (GPSB) and its subsidiaries (“the Group”) are committed to conducting business dealings with integrity and avoiding practices of bribery and corruption of all forms in the Group’s daily operations. Even the perception of bribery is to be avoided.
- 1.2 It is the Group’s policy to conduct all of the Group’s businesses in an honest and ethical manner. The Group takes a zero-tolerance approach towards bribery and corruption. The top-level management of the Group is committed to acting professionally, fairly and with highest integrity in all the Group’s business dealings and relationships wherever the Group operates which shall be in accordance with applicable laws and regulatory requirements and implementing and enforcing effective systems to counter bribery and corruption.
- 1.3 The Group will uphold all applicable laws to countering bribery and corruption in all the jurisdictions in which the Group operates. However, the Group remains bound by the laws in Malaysia in respect of the Group’s conduct both at home and abroad.
- 1.4 The consequences of bribery and corruption are severe, and may include imprisonment, fines, and damage to the Group’s reputation. The Group therefore takes its legal responsibilities very seriously.
- 1.5 This policy shall be read in conjunction with all other applicable policies of the Group.

### 2. Application

2.1 This policy applies to:-

- The Group and its subsidiaries where GPSB or its subsidiaries have management control;
- All employees working at all levels and grades, including senior managers, officers, nominees, employees (whether permanent, fixed-term or temporary), trainees, seconded staff, casual workers and agency staff, of the Group, wherever located (collectively referred to as employees in this policy) and directors. This includes employees on secondment to joint ventures, affiliates or associates;
- Third parties (with whom appropriate contractual arrangements have been established) and all Business Partners are also expected to comply with this policy. The Group expects all its Business Partners acting on behalf of the Group to refrain from bribery and corruption practices and to adhere to any policies which may be imposed by the Group from time to time including this policy; and
- The Group’s business dealings with commercial (‘private sector’) and government (‘public sector’) entities.

## 3. Definition

- 3.1 **“Bribery”** refers to the offering, promising, giving, accepting or soliciting (including an undertaking or promise to make, whether conditional or unconditional) of an advantage or something of value in an attempt to illicitly influence the decisions or actions of a person of a position of trust within an organization or as an inducement for action which is illegal or a breach of trust or for any improper commercial, contractual, regulatory or personal advantage. This will include where anyone acting on behalf of the Group attempts to influence the actions of a third party, such as a governmental official or client decision-maker and where a third party is attempting to influence someone within the Group such as decision-maker or someone with access to confidential information.
- 3.2 **“Corruption”** may include acts of extortion, collusion, breach of trust, abuse or misuse of power, office or position, trading under influence, embezzlement, fraud or money laundering.
- 3.3 **“Third party”** means any individual or organization the employees or directors come into contact with during the course of the employees’ or the directors’ work or dealings for the Group. These include actual and potential clients, customers, suppliers, contractors, subcontractors, consultants, any parties engaged or has the intention to be engaged with the Group, distributors, business contacts, agents, advisers, and any political party, official of a political party, or candidate for public office, and governmental officials and public bodies, including the directors, officers, and employees of government-owned and government-controlled companies and public international organizations and anyone who holds a legislative, administrative or judicial decision of any kind (whether appointed or elected) or who exercises a public function for or on behalf of a country or territory or any public agency or public enterprise) as well as their respective advisors, agents and representatives.
- 3.4 **“Business Partner”** includes clients, customers, joint ventures, joint venture partners, investors, consortium partners, outsourcing providers, contractors, sub-contractors, suppliers, vendors, advisers, agents, distributors, representatives, and intermediaries.

## 4. Guidance

### Employee Responsibilities

- 4.1 As an employee or director of the Group, as the case may be, the employee or director must ensure that he or she reads, understands, and complies with the information contained within this policy (as may be amended from time to time), and with any training or other anti-bribery and anti-corruption information that the he or she is given.
- 4.2 All employees, directors, and those under the Group's control are:-
- Equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption;
  - Required to avoid any activities that could lead to, or imply, a breach of this policy; and
  - Responsible to check for any updates on the Group’s website from time to time at [www.glenealyplantations.com.my](http://www.glenealyplantations.com.my)

### **Gifts, Entertainment Travel, Donation, Sponsorship and Hospitality**

4.3 The Group prohibits both the giving and receiving of gifts, entertainment and hospitality, travel, donation and sponsorship to influence business decisions.

4.4 It is acknowledged that the practice of business gifts, entertainment and hospitality, travel, donations and sponsorship varies between countries, and what may be deemed as acceptable in one country may not be in another. The Group allows normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts, entertainment and hospitality, travel, donations and sponsorship are in accordance with the conditions as set out in the Group's Gifts and Entertainment Policy and all other applicable policies of the Group.

### **Facilitation Payments & Kickbacks**

4.5 The Group does not accept and will not make any form of facilitation payments or kickbacks of any nature. The Group recognizes that facilitation payments are a form of bribery that involves securing or expediting or facilitating the performance of a public official for a routine, administrative or function of any governmental action and kickbacks are typically made in exchange for a business favour or advantage.

### **Political and Charitable Contributions**

4.6 As a general principle, the Group will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates of any political parties.

4.7 The Group accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise). The Group will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the Group's Human Resource Department.

### **Due Diligence**

4.8 The relevant departments or persons in the Group may at its discretion, prior to the entry into any formalized relation of employees, directors, third parties or Business Partners, conduct due diligence on such persons which may include, but not be limited to, background checks, document verification or conducting interviews and such due diligence shall be a precondition to entry to any formalized relation with such persons.

4.9 If suspicion of bribery and corruption arises in dealings with any Business Partners, the Group shall seek an alternative provider of the services or goods and will terminate any contractual relationship with any Business Partners in which bribery or corruption has been ascertained.

4.10 If the Group is not satisfied with the bribery and corruption prevention measures upheld by the Business Partners, the Group may conduct due diligence with regards to any Business Partner intending to act on behalf of the Group.

### **Conflict of Interest**

4.11 Conflicts of interest arise in situations where there is a personal interest that might be considered to interfere with that person's objectivity when performing duties or exercising judgement on behalf of the Group. The employees and directors should avoid or deal appropriately with situations in which personal interest could conflict obligations or duties. The employees and directors must not use their position, official working hours, the Group's

resources and assets for personal gain of the employees and directors, or to the Group's disadvantage. All employees and directors are expected to make business decisions in the best interest of the Group.

### **Raising a Concern**

4.12 The employees, directors, third parties or Business Partners should raise concerns about any issue or suspicion of malpractice or non-compliance of this policy at the earliest possible stage.

4.13 If the employees, directors, third parties or Business Partners are unsure whether a particular act constitutes bribery or corruption, or if the employees, directors, third parties or Business Partners have any other queries or concerns, these should promptly be raised to the Group Human Resource Department. Alternatively, the employees, directors, third parties or Business Partners may also raise such queries or concerns through the Group's whistleblowing channel at [whistleblower@samling.com.my](mailto:whistleblower@samling.com.my). Please refer to the Group's Whistleblower Policy for details.

### **Consequences for Non-compliance**

4.14 Non-compliance by employees may lead to disciplinary actions, up to and including termination of employment. Any such directors will be removed from his office. Further legal action may also be taken in the event that the Group's interests have been harmed as a result of non-compliance.

4.15 The Group shall notify the relevant regulatory authority if any allegations on bribery or corruption incidents were found to be true. Where notification to the relevant regulatory authorities have been done, the Group shall provide full co-operation to the said regulatory authorities, including further actions that such regulatory authority may decide to take against convicted employees, directors, third parties or Business Partners.

### **Record Keeping**

4.16 The Group will:-

- Keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made; and
- Keep a written record of the amount and reason for hospitality, donations, charitable contributions, sponsorships or gifts accepted and given in a register to be kept under the purview of the Corporate Communication Department.

## **5. Administration**

### **Communications and Training**

5.1 Training on this policy forms part of the induction process for all new employees and directors. All existing employees and directors will receive regular, relevant trainings on how to implement and adhere to this policy and the applicable laws. In addition, all employees and directors will be asked to formally accept and declare conformance to this policy on an annual basis or as and when deemed required by the Group Human Resource Department.

5.2 The Group's zero-tolerance approach to bribery and corruption must be communicated to all Business Partners at the outset of the Group's business relationship with them and as appropriate thereafter.

### **Policy Review**

5.3 The Group will monitor the effectiveness of the implementation of this policy and conduct regular risk assessments to identify the bribery and corruption risks potentially affecting the Group when the Group deems necessary or as required under the applicable laws.

5.4 This policy will be amended from time to time to take into account relevant developments in the laws as well as the circumstance of the business of the Group, evolving industry and international standards.

## **6. References**

6.1 Malaysian Anti-Corruption Commission Act, 2009

6.2 The detailed Anti-Bribery and Anti-Corruption Policy

6.3 The detailed Gift and Entertainment Policy

## **7. Policy Distribution**

7.1 All employees and directors in the Group

7.2 Business Partners of the Group

Date: 01 June 2020