

GLENEALY PLANTATIONS SDN BHD

Gift & Entertainment Policy

1. Policy Purpose

- 1.1 In line with the ABAC Policy and the commitment to conduct business free from any corruption offence under any applicable laws such as the Malaysian Anti-Corruption Commission Act 2009, this policy intends to establish guidelines and parameters for the giving and accepting of Benefits by the employees and directors of the Group.
- 1.2 The Group acknowledges that the practice of business Benefits varies between countries and regions. The intention behind the Benefits should always be considered, so that it does not create an appearance of bad faith and impropriety. Benefits must not be misunderstood by others to be a bribe and/or corrupt act.

2. Application

- 2.1 This policy applies to the same parties set out in the ABAC Policy.
- 2.2 The Group considers a contravention of this policy to be a serious violation which may result in disciplinary action. The disciplinary action could extend to the dismissal of an employee and removal from an office of a director, in appropriate circumstances, or the termination of the business relationship with third parties including Business Partners (both as defined below).
- 2.3 This policy shall be read in conjunction with all applicable policies of the Group.

3. Definition

- 3.1 “**ABAC Policy**” means the Group’s Anti-Bribery and Anti-Corruption Policy dated 1 June 2020. The ABAC Policy may be amended from time to time.
- 3.2 “**Benefits**” refer to the following:-
 - Gifts, Entertainment and Hospitality and Travel;
 - Sponsorship and Donations;
 - Charitable contributions or donations; and
 - Consulting of any type of services, personal loans, discounts and other intangible benefits, such as exclusive memberships.

3.3 **“Entertainment and Hospitality”** refer to anything of value which includes but is not limited to:

- Accommodation, travel tickets (for the purpose of the invitations for business events, conferences or seminars); and
- Invitations for business events, technical conferences, sports events, recreation and other types of hospitality, as well as occasional invitations for meals.

3.4 **“Gift(s)”** refer to anything of value in the form of cash or cash equivalents, including but not limited to free samples, gift certificates, lucky draw prizes, favours, personal service, festive hampers or those otherwise, provided directly or indirectly (such as through an intermediary or to family member or person with a close personal relationship), that may put the employees or directors in position of conflict, influence the business decision or is otherwise intended or given with the expectation of gaining any advantage or which may adversely affect the Group’s reputation.

3.5 The following terms shall have the same definition as set out in the ABAC Policy:-

- **“employee(s)”**;
- **“Business Partner(s)”**;
- **“third party”**;
- **“Register”**; and
- **“the Group”**.

3.6 **“Sponsorship and Donation”** shall include, but are not limited to, the following:-

- Supporting people, organisations or events through money, goods or services with the purpose of promoting the Group’s communication and marketing objectives such as to obtain brand awareness and/ or improve image or reputation; and
- Cash and/or benefit is given to an individual or organisation to assist that individual or organisation perform or pay for an act (e.g. an individual running a race, or an organisation holding a sporting or cultural event or a conference, or a sports team rebuilding its pitch).

4. Guidance

General Principles

4.1 Employees, directors and their family members must not solicit any Benefits from third parties (including Business Partners) directly or indirectly and they are also discouraged from accepting or giving Benefits from or to these parties. Occasional acceptance or provision of Benefits is allowed to promote good business relationships but must be done in accordance with this policy and the ABAC Policy.

4.2 Regardless of the amount and as good practice, employees or directors, where applicable, must disclose any Benefits received or to be received from any third parties including Business Partners to the Head of Human Resource of the Group Human Resource Department.

4.3 Benefits should be proportionate to the nature, scale and complexity of the business activities of the Group. This would be determined on a case by case basis, taking into account relevant considerations such as cross cultural sensitivities.

4.4 The directors and employees shall ensure that all the applicable and specific conditions are adhered to prior to the accepting or giving of any Benefits.

Giving and Accepting Gifts

4.5 Subject to the conditions under paragraphs 4.1 to 4.4 and the approval of the management of the respective company of the Group, employees and directors may give or accept Gifts if specific conditions are met.

4.6 Where it is inappropriate to decline the offer of a Gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the employee should declare and handover the Gift to the Group's Human Resource Department immediately. Any Gift which violates the terms of any applicable policy of the Group must be declined/returned with an explanation thanking the party for the Gift with polite explanation of all applicable policies of the Group.

Travel

4.7 Employees and directors shall not accept or give any travel expenses unless such expense is for business purposes or as provided under contracts for services. The visit must be for a legitimate business purpose and prior approval in accordance with established procedures must be obtained.

4.8 Employees and directors may accept lodging and other expenses (e.g food, transportation, etc) provided by the third parties including Business Partners within the host country if the trip is for business purposes and prior approval has been obtained from the Head of Human Resource of the Group Human Resource Department

Entertainment and Hospitality

4.9 Employees, directors and their family members must not provide, receive or solicit any form of Entertainment and Hospitality from Business Partners directly or indirectly.

4.10 Employees, directors and their family members may give or accept invitations to social events or entertainment within reason according to the scope of their work provided these events or entertainment are not lavish or become a regular feature that may influence business decision making process and provided that specific conditions relating to the receiving and offering of Entertainment and Hospitality imposed by the Group are met.

Sponsorship and Donation

4.11 The Group prohibits both the giving and/or accepting of Sponsorship and Donation that may influence business decisions.

4.12 The Group may provide Sponsorship and Donations subject to the conditions set out in paragraphs 4.1 to 4.4, approval from the management of the respective company of the Group and the following, as appropriate and where applicable:-

- A verification of agenda is conducted on the event/performance/act;
- In the event there is any contract pursuant to such event/performance/act, the anti-bribery and anti-corruption clause is included; and
- The recipient is required to report back to the Group on the progress of the event/performance/act and supported with necessary documentation.

Charitable Contribution or Donation

4.13 The Group accepts the act of donating to charities whether through services, knowledge, time, or direct financial contributions (cash or otherwise) subject to the approval from the Head of Human Resource of the Group Human Resource Department and provided that specific conditions applicable to the foregoing are met.

Reporting and Register

4.14 Employees and directors should approach the Head of Human Resource of the Group Human Resource Department for the following purposes:-

- Reporting pursuant to this policy or the ABAC Policy;
- For seeking clarification; and/or
- For consultation if in doubt.

4.15 The Group will require all Benefits given to third parties to be properly accounted for by recording them via the Register, which is kept under the purview of the Corporate Communication Department.

5. Administration

Communications and Training

5.1 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 stance on the Benefits 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 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 Group's Anti-Bribery and Anti-Corruption Policy; and

6.3 The Group's detailed Gifts & Entertainment Policy

7. Policy Distribution

7.1 All employees and directors in the Group; and

7.2 Business Partners of the Group.

Date: 01 June 2020