



PeterLabs Holdings Berhad
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PeterLabs Holdings Berhad

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TO WHOM IT MAY CONCERN 敬启者

**ANTI-BRIBERY AND ANTI-CORRUPTION
POLICY AND GUIDELINES**

反贿赂和反腐败政策与准则

1. INTRODUCTION

This Anti-Bribery and Anti-Corruption Policy (**“ABAC Policy & Guidelines”**) serves as a guideline to reinforce PeterLabs Holdings Berhad’s (**“PeterLabs”**) utmost commitment and practice in conducting its affairs in a highest standard of integrity and ethics in line with the intent and spirit of Malaysian Anti-Corruption Commission Act 2009 [Act 694] and Malaysian Anti-Corruption Commission (Amendment) Act 2018 and all applicable laws and regulations involving bribery and corruption.

本反贿赂和反腐败政策（“ABAC 政策与准则”）可作为指南，以强化 PeterLabs Holdings Berhad（“PeterLabs”）在处理其业务秉持着最高诚信和道德标准的最大承诺和实践，并符合《2009年马来西亚反贪污委员会法案》（第694号法）和《2018年马来西亚反贪污委员会法案（修订案）》以及所有涉及贿赂和腐败的适用法律和法规的意图与精神。

With this policy, the company anticipates to detect exposure of bribery or corruption, to provide clear directions to all Personnel (*as defined herein below*) when faces or dealing with issues of bribery or corruption that may arise during the course of business, and to combat any potential risks of bribery or corrupt practices. To achieve the objective successfully, the company imposes strict compliance and monitoring of this policy where all Personnel is required to read, fully understand and apply the contents of this policy when performing day-to-day tasks and responsibilities.

有了这项政策，公司有望检测到贿赂或腐败的风险，在面对或处理业务过程中可能出现的贿赂或腐败问题时，向所有人员（定义见下文）提供明确的指导，并打击任何潜在贿赂或腐败行为的风险。为了成功实现该目标，公司在执行日常任务和职责时要求所有人员都必须阅读，充分理解和应用本政策的内容，并严格遵守和监控本政策。

The company's attempt in setting out the major principle, standards and function of this policy may not adequately provide you with a definite answer to all your queries, it is, therefore, important for you to clarify and write to the following channel in the event of ambiguity and uncertainty.

公司试图阐明本政策的主要原则，标准和功能，但这有可能无法充分提供明确的答案以解除你所有的疑惑，因此，至关重要的一项是如有歧义和不确定性，请联系电子邮件：

Email: anti-corruption@peterlabs.com.my

2. APPLICABILITY 适用性

This ABAC Policy & Guidelines applies to all Person Associated (as defined under the MACC Act 2009) with PeterLabs' group of companies, which includes Director, Partner, Employee and those who Performs Service on behalf of the company (hereinafter collectively referred to as "**Personnel**").

本 ABAC 政策与准则适用于与 PeterLabs 的公司集团相关的所有人员（根据 2009 年马来西亚反贪污委员会法案的定义），包括董事，合伙人，雇员以及代表公司提供服务的的人员（以下统称为“人员”）。

The ultimate responsibilities of upholding this policy falls upon all Personnel of PeterLabs. Therefore, it is crucial that all employees shall ensure that any and all service providers of the company is made known of this policy, understood the contents and agree to adhere to this policy.

坚守这项政策的最终责任在于 PeterLabs 的所有人员。因此，至关重要的一项是，所有雇员均应确保使公司的所有服务提供商都深知此政策，了解其内容并同意遵守该政策。

For the avoidance of any doubt, and the purpose of interpretation of those who performs service on behalf of the company or service providers of the company extend to external party engaged by the company or which the company contracts or more commonly known as 'business associates' such as clients, customers, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, intermediaries and investors (hereinafter referred to as "**Business Associates**").

为避免任何疑问，代表公司或公司的服务提供商的定义延伸至公司聘用的外部或与公司签约或更普遍称为“商业伙伴”的外部方例如客户，顾客，合资伙伴，财团伙伴，外包提供商，承包商，顾问，分包商，供应商，卖方，顾问，代理商，分销商，中介机构和投资者（以下简称“商业伙伴”）。

THE POLICY 政策

PeterLabs group of companies adopts a zero-tolerance approach in any and all forms of bribery and corruption. All Personnel are strictly prohibited from participating in any activities of bribery and corruption.

PeterLabs 公司集团对任何形式的贿赂和腐败都采取零容忍的态度。本公司严格禁止所有人员参与任何贿赂和腐败活动。

BRIBERY / CORRUPTION is defined primarily as any act constituting an offence of offering ('outbound') or accepting ('inbound') 'Gratification' as an inducement or a reward for doing or forbearing to do, or for having done or forborne to do, any act in relation to PeterLabs' principal affairs or business, or for showing or forbearing to show favour of disfavor to any person in relation to PeterLab's principal affairs or business.

贿赂 / 腐败主要被定义为任何构成犯罪的行为（“往外”）或接受（“往内”）利益作为其者所做/做了某些事或非愿意做/做了某些事的诱使或报酬，或与 PeterLabs 的主要事务或业务有关的任何行为，或表明或容忍对任何与 PeterLabs 的主要事务或业务有关的人表示不利的行为。

It applies equally to all private sectors and public body.

它同样适用于所有私营部门和公共机构。

GRATIFICATION (as defined under the MACC Act 2009) involves:-

利益（根据 2009 年马来西亚反贪污委员会法案的定义）包括： -

(a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;

(a) 金钱，捐赠，礼物，贷款，费用，报酬，有价证券，财产或财产中的权益，无论是动产还是不动产，财务利益或任何其他类似的好处；

(b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;

(b) 任何职务，尊严，雇用，雇用合同或服务，以及以任何身份提供就业或提供服务的协议；

(c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;

(c) 全部或部分的任何贷款，义务或其他负债的付款，释放，解除或清算；

(d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;

(d) 任何形式的有价值的对价，折扣，佣金，回扣，奖金，扣除额或百分比；

(e) any forbearance to demand any money or money's worth or valuable thing;

(e) 任何金钱或金钱的价值或贵重物品的要求；

(f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and

(f) 任何其他形式的服务或恩惠，包括保护以免受到任何处罚或致残，或免受纪律，民事或刑事性质的任何诉讼或程序（无论是否已建立），并包括任何权利或任何官方权力或职责的行使或对行使的宽恕；和

(g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).

(g) (a) 至 (f) 任何一段所指的提供，承诺或誓言，不论是有条件或无条件的任何满足，保证或承诺。

4. DUE DILIGENCE AND RISK ASSESSMENT 尽职调查和风险评估

All employees shall satisfy the status and probity of Business Associate currently engaged by the company and similarly to Business Associate which the company intends to appoint / engage / renew its appointment.

所有雇员均应满足公司当前聘用的商业伙伴的身份和廉洁，和类似与公司打算任命/聘用/续聘的商业伙伴都须满足上述需求。

Where applicable, employee is required to conduct appropriate counterpart due diligence on sources or destination of funds. All transactions involving the company shall be recorded and reflected accurately in the books and records with sufficient details which include its amount, nature, purpose, and recipient.

在适用的情况下，要求雇员对资金的来源或目的地进行适当的尽职调查。所有与公司有关的交易均应在账簿和记录中准确记录和反映，并有足够的详细信息，包括其金额，性质，目的和接收人。

It is also pertinent for all employees to conduct regular verification of compliance of this policy amongst or within the company and extend to all Business Associates.

所有雇员，在公司内部并扩展到所有商业伙伴，进行定期审核以审视是否符合本政策的规定，也是至关重要的。

In the event of a suspected transaction or violation of this policy, all employees are under the duty to report it to their respective immediate superior and to the whistle blowing channel.

如果发生涉嫌交易或违反本政策的情况，所有雇员都有责任向其各自的直属上级和举报渠道举报。

All Personnel shall observe the following:-

所有人员应遵守以下规定： -

- a. Gifts and entertainment as an inducement or reward in relation to PeterLabs' affairs or business are strictly prohibited;

严禁将礼品和娱乐作为与 PeterLabs 的事务或业务相关的诱因或奖励；

- b. Genuine donations and sponsorships made in good faith may be permitted subject to approval of the Board of Directors authorised by the Managing Director or General Manager and reviewed by the respective requestor/department with sufficient information of due diligence and risk assessment being conducted and furnished; and

真诚的善意捐赠和赞助可能要经董事经理或总经理授权的董事会批准，并由相应的请求者/部门进行审查，并提供充分的尽职调查信息，进行和提供风险评估；和

- c. Any actual or potential conflict of interests shall be avoided and disclosed to the company.

应避免任何实际或潜在的利益冲突，并须向公司披露。

It is a prerequisite for all Business Associates to agree and undertake the following:-

所有商业伙伴都必须同意并承担以下任务：

- a. To furnish sufficient and accurate information and documents to PeterLabs for due diligence and risk assessment;

向 PeterLabs 提供足够和准确的信息和文件，以进行尽职调查和风险评估；

- b. To consent to the disclosure of information for investigation purpose arising of a reasonable suspicious circumstances in violation of this policy and where permitted or compelled by law;

如有违反本政策并在法律允许或强迫下,同意协助调查并且披露有关信息；

- c. To declare to its best knowledge, that none of its Person Associated has been convicted of any offence involving bribery or corruption, nor to the best of its knowledge is any such person the subject of any investigation, inquiry or enforcement proceedings by any governmental or regulatory body;

据其所知的申明没有任何关联人被裁定犯有任何涉及贿赂或腐败的罪行，也据其所知申明任何此类人均未受到任何政府或监管机构的调查，询问或执行程序；

- d. To forthwith furnish all information and details for any contraventions of the contents of this policy; and

随即提供所有违反本政策内容的信息和细节；和

- e. To ensure that it's Person Associated which includes Director, Partner, Employee and those who Performs Service on behalf has read, understood and agree to abide by all the standards and provisions set out in this policy.

确保董事，合伙人，雇员和代表执行服务的人员在内和相关人员已阅读，理解并同意遵守本政策中规定的所有标准和规定。

5. REPORTING 举报

Any suspected attempt in violation or actual violation of this policy or attempt to solicit any bribe or improper advantage, whether financial or otherwise, which may include but not limited to under table payment, facilitation payment, unrecorded payment, false or misleading entries shall be reported promptly via the following secured channel:-

任何涉嫌企图违反或实际违反本政策，或企图索取任何贿赂或不正当好处，无论是财务上还是其他方面的，包括但不限于台底交易，疏通费，未记录的付款，虚假或误导性的输入，均应通过以下安全渠道迅速举报： -

Whistle blowing channel:- 举报管道

Email 电邮 : **whistleblowing@peterlabs.com.my**

Whistleblower who lodge a whistle blowing report is encouraged to disclose the following information:-

举报人应披露以下信息：

- a. Full Name;
全名
- b. Company, if any;
公司，如有

- c. Contact details;
联系资料
- d. Background information of report;
举报信息
- e. Reasons or justification of suspicion; and
理由或怀疑的依据
- f. Identity of such person committing the alleged violation
涉嫌违规者的身份

To encourage the use of whistle blowing channel without fear by all employees and Business Associates of PeterLabs, whistleblowers who reported in good faith may be conferred protection of confidential information and protection against detrimental action to such extent reasonably practicable.

为了鼓励 PeterLabs 的所有雇员和商业伙伴无所畏惧使用举报管道，真诚举报机密信息的举报者可在合理可行的范围内被授保护。

6. NON-COMPLIANCE 违规

Non-compliance of this policy by employee is regarded as a serious misconduct which may lead to disciplinary action of immediate termination in addition to legal consequences and liability that may arise in the event the company's interest is prejudiced as a result arising from the conduct of the rogue employee.

雇员不遵守本政策的行为被视为严重。如果因为这些违规的行为而导致公司的利益受损，可能会引来立即终止合同的纪律处分，还需承担法律后果和责任。

In respect of Business Associate, any violation of this policy may result in immediate revocation or termination (as applicable) of contract or relationship, without any liability whatsoever on PeterLabs' group of companies. The Business Associate in question shall further indemnify and keep PeterLabs indemnified for any losses and damages that may arise as a result of violation of this policy by the Business Associate.

对于商业伙伴，任何违反本政策的行为都可能导致合同或关系的立即撤销或终止（如适用），而 PeterLabs 的公司集团无需承担任何责任。有问题的商业合作伙伴应进一步赔偿 PeterLabs，因商业合作伙伴违反本政策而造成的任何损失和损害给予 PeterLabs 赔偿。

We thank you again for your cooperation and efforts in meeting our business requirements and we look forward to your continued support in the future.

我们再次感谢您在满足我们的业务要求方面的合作与努力，并希望您今后继续提供支持。

Sincerely,



Lim Tong Seng
Managing Director 董事经理

ACKNOWLEDGEMENT & DECLARATION 认同和申明

I, _____ hereby declare that I have read, understood and agree to abide by all the standards and provisions set out in this policy of PeterLabs.

我，_____特此声明，我已阅读，理解并同意遵守 PeterLabs 本政策中规定的所有标准和规定。

Name 姓名:

NRIC No 身份证号码:

Designation 职位:

Company 公司:

Date 日期: