



GADANG GROUP OF COMPANIES

ANTI – BRIBERY & CORRUPTION POLICY



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GADANG GROUP OF COMPANIES

ANTI – BRIBERY & CORRUPTION POLICY

1. INTRODUCTION & PURPOSE

GADANG HOLDINGS BERHAD and its subsidiaries (collectively referred to as “Gadang”, “Group”, “we”, “us” or “our”) are committed to conducting its business dealings with integrity. This means avoiding practices of bribery and corruption of all forms in the Group’s daily operations.

The purpose of this **Anti-Bribery & Corruption Policy** (hereinafter referred to as “**Policy**”) is to provide guidance to Executive Directors of the Group (hereinafter referred to as “**EDs**”), and Employees (including probationary, contract, permanent, project, temporary employees) (hereinafter referred to as “**Employees**”) concerning how to deal with bribery and corruption and related issues that may arise in the course of business. It reiterates Gadang’s commitment to ensure full compliance by its EDs and Employees with the Malaysian Anti-Corruption Commission (MACC) Act 2009 and the MACC (Amendment) Act 2018 and any other local anti-bribery or anti-corruption laws that may be applicable. This Policy complements and must be read in conjunction with our Code of Ethics and Conduct and our Whistleblowing Policy.

New enforcement under Section 17A (1) of the MACC (Amendment) Act 2018 effective June 2020, states that a commercial organisation commits an offence if a person associated with the commercial organisation (such as its EDs or employees) corruptly gives, agrees to give, promises or offers to any person any gratification whether for the benefits of that person or another person with intent –

1. To obtain or retain business for the commercial organisation; or
2. To obtain or retain an advantage in the conduct of business for the commercial organisation.

The penalty for an offence under Section 17A (1) is a fine of not less than 10 times the sum or value of the gratification or RM1,000,000.00 whichever is the higher, or to imprisonment for a term not exceeding 20 years or to both. If a commercial organisation is charged for an offence under Section 17A (1), under Section 17 (4), it is a defence for the commercial organisation to prove that it had in place adequate procedures to prevent persons associated with the commercial organisation from undertaking such conduct.

EDs, Employees and any other person or persons associated with Gadang (including third parties) have a duty to: -

- Read and understand the Policy in order to be familiar with the applicable requirements and directives as per this document.
- Raise and report suspicious transactions, violations or suspected violations of policy to line managers or HOD. If notifying the line managers or HOD is not possible or inappropriate for any reason, or not in the best interest of the Group, EDs and Employees can raise the concerns via Gadang’s Whistleblowing Policy.

The scenarios provided within this Policy do not limit the boundaries of the Policy which may be extended to cover all circumstances relating to bribery and corruption. The Policy leverages on the values and core principles set out in our Code of Ethics and Conduct. Full compliance to both the spirit and the letter of this Policy is mandatory and must be maintained using a principle-based approach.



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2. SCOPE

This Policy applies to EDs, Employees and any other person or persons associated with Gadang (including third parties). In the context of this Policy, third-party refers to any individual or organisation Gadang meets and works with. It refers to actual or potential clients, advisers, business associates, joint venture partners, agents, vendors, suppliers, distributors, contractors, consultants, customers, government and public bodies and any other third-party service providers or persons who perform services for or on behalf of the Group – this includes their advisers, representatives and officials, politicians and public parties.

Any arrangements Gadang makes with a third party is subjected to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

3. DEFINITIONS

Bribery	Any act of offering, receiving or soliciting something of value or gratification (including payment of cash, gifts, excessive entertainment or an inducement of any kind) in an attempt to illicitly influence the decisions or actions of a person in a position of trust within an organisation. Definition of “Gratification” is based on the definition in Malaysian Anti-Corruption Commission (MACC) 2009.
Corruption	Abuse of entrusted power for private gain.
“Contractor” or “third party service provider”	Entity or individual who provides, and receives payment for, services or goods related to any aspect of Gadang’s operations, and includes subcontractors.
Conflict of interest	EDs or Employees’ outside or private interests, relationships or activities that interfere or appear to interfere with the fairness / integrity of the Group’s business dealings. Conflict of interest can occur in both direct and indirect situations.
Employees	All employees of the Group including probationary, contract, permanent, project, and temporary employees.
Family Members	Includes spouse(s), children (including step-children and adopted children), parents, step-parents, siblings, step-siblings, grandparents, grandchildren, in-laws, uncles, aunts, nieces, nephews, and first cousins, as well as other persons who are members of your household.
Entertainment / Hospitality Expenses	Meals, drinks, lodging, travel or other expenses given to or received from people who have or who may have facilitated the creation of a business relationship with Gadang. This includes expenses incurred by / for a



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	prospective client, customer or business partner. Expenses can be a legitimate contribution to achieving a business outcome and also includes attendance at social, cultural or sporting events.
Gifts	Monies, vouchers, hampers, goods or services, which, if given appropriately, are a mark of friendship or appreciation. Gifts must be given without expectation of consideration or value in return.
Money Laundering	Process of introducing money, property or other assets derived from illegal and criminal activities into the legal financial and business cycle to give it a legitimate appearance. It is a process to clean 'dirty' money in order to disguise its criminal origin.
Public Officials	Includes officers to Public Bodies, candidates for public office, officials of any political parties and officials of any state-owned enterprises.
Third Party	Actual or potential clients, advisers, business associates, joint venture partners, agents, vendors, suppliers, distributors, contractors, consultants, customers, government and public bodies and any other third-party service providers or persons who perform services for or on behalf of the Group.

4. POLICY STATEMENT

Gadang is committed to acting professionally, fairly and with integrity in all business dealings and relationships. We are committed to:-

- Conduct business in an ethical and honest manner;
- Implement and enforce systems that ensure bribery and corruption is prevented; and
- Take all necessary measures to ensure that our businesses do not participate in corrupt activities and to implement adequate procedures effectively to comply with the provisions of MACC Act 2009 and Section 17A of the MACC (Amendment) Act 2018.

Bribery is a crime and penalties can be severe including prison sentences and large financial penalties. Depending on the circumstances, these penalties can be applied to a company, EDs, Employees and third parties or a combination of any of them. EDs and Employees are reminded that he/she will be subject to stern disciplinary action, including dismissal as well as civil and criminal liability, if he/she is found in violation of this policy.



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5. GIFTS, HOSPITALITY AND ENTERTAINMENT

Gadang accepts normal and appropriate gestures of hospitality and goodwill (whether given to / received from third parties) so long as the giving or receiving of gifts / hospitality / entertainment meets the following requirements and approved by the Management: -

- i. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favors or benefits;
- ii. It is not made with the suggestion that a return favor is expected;
- iii. It is in compliance with local law;
- iv. It is given / received in the name of the company, not in an individual's name;
- v. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate);
- vi. It is appropriate for the circumstances (e.g. giving / receiving a small thank you gift for helping with a large project upon completion);
- vii. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift;
- viii. It is given / received openly, not secretly;
- ix. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them;
- x. It is not lavish and above a certain excessive value, as pre-determined by Management;
- xi. It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of Management; and
- xii. 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 gift may be accepted so long as it is declared and approved by Management.

Gadang recognises the practice of giving and receiving business gift varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

Some examples of acceptable gifts / hospitality / entertainment are as follows: -

- i. Token gifts offered in business situations or to all participants and attendees, for example, work related seminars, conferences, trade and business events;
- ii. Gifts presented at work-related conferences, seminars and/or business events;
- iii. Gifts given in gratitude for hosting business events, conferences and/or seminars;
- iv. Refreshments or meals during meetings or as participants of work-related conferences and/or seminars; and
- v. Meals for business purposes.

As a general principle, EDs and Employees should not accept or give any gifts / hospitality / entertainment to a third party if it is made with the intention of influencing the third party to obtain or retain business, or in exchange for favours or benefits.

EDs and Employees are prohibited from receiving or soliciting festive hampers and overseas incentive trips (excluding factory visits) paid by vendors or any third parties.



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6. CORPORATE RESPONSIBILITY, SPONSORSHIP AND DONATION

Corporate responsibility / sponsorship / donation contribution is acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, EDs and Employees must be careful to ensure that such contributions are not used as a scheme to conceal bribery. No such contribution can be offered or made without the prior approval of Management.

The records of all corporate responsibility / sponsorship / donation contribution shall be kept by the Group Administration.

Generally, all corporate responsibility / sponsorship / donation contribution must comply with the following:

- i. Ensure such contributions are allowed by applicable laws;
- ii. Obtain the necessary authorisation from the Management;
- iii. Made to established entities, after due diligence has been conducted, to guarantee proper administration of the funds;
- iv. Accurately stated in Gadang's accounting books and records; and
- v. Not to be used as a means to cover up an illegal payment or bribery.

Examples of red flags to look out for are as follows:

- The contribution is made on behalf of a Public Official;
- The proposed recipient has affiliations with a Public Official or their relatives are involved;
- There is a risk of a perceived improper advantage for Gadang.

Please refer to CSR SOPP effective 1st October 2023 for further details.

7. POLITICAL CONTRIBUTIONS

No political contributions are permitted to be made, directly or indirectly, to any political candidate or any political party except where such contributions are not prohibited by law and express permission has been given by the Management.

The records of all political contributions shall be kept by the Risk, Sustainability & Compliance Department ("RSC").

8. FACILITATION PAYMENTS

Facilitation payments are unofficial payments or other advantages made to secure or expedite the performance of a routine or administrative duty or function. EDs and Employees shall not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action.

EDs and Employees are expected to notify their immediate superior when encountered with any requests for a facilitation payment.



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9. MONITORING OF GIFTS AND BENEFITS

Monitoring of gift and benefits for following: -

- Gifts, Hospitality and Entertainment
- Corporate Responsibility, Sponsorship & Donation
- Political Contributions
- Facilitation Payments

On quarterly basis, the Group Finance & Accounts will request relevant data from the respective division or HOD as per the sustainability reporting template issued by RSC.

The completed data or information will be recorded in the “Finance – Sustainability Reporting Template” by Group Finance & Accounts and submit to RSC. RSC will report the information to Risk Management & Sustainability Committee (“RMSC”) and Board Risk & Sustainability Committee (“BRSC”).

10. PURCHASING AND PROCUREMENT PRACTICES

EDs and Employees are responsible to ensure Gadang's purchase of required materials, supplies, plant & machinery, equipment and sub-contract services are procured at the most favourable and competitive terms as according to the standards stated in the Procurement Committee (PROCOM) Standard Operating Procedures.

EDs and Employees must avoid soliciting illegal purchase and procurement practices and be cautious of involvement in any bribery or corrupt act.

11. RECRUITMENT OF EMPLOYEES

The recruitment of EDs and Employees will be based on approved selection criteria to ensure that only the most qualified and suitable individuals based on qualifications, performance, skills and experience are employed. This is also crucial to ensure that no element of corruption is involved in the hiring of employees.

In line with this, proper reference checks (if needed) shall be conducted in order to ensure that the potential EDs and Employees have not been convicted in any bribery or corruption cases.

The workflow for recruitment process is included in APPENDIX 1.

12. MONEY LAUNDERING

Gadang strongly objects to practices related to money laundering, including dealing in the proceeds of criminal activities. EDs and Employees must avoid violating Gadang's anti-money laundering policy and existing anti-money laundering laws in the country, at all cost.

EDs and Employees are expected to conduct reasonable due diligence on clients and third parties to understand their business background and to determine the origin and destination of money, property and services.



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13. DEALINGS WITH THIRD PARTIES AND PUBLIC OFFICIALS

Gadang's dealings with third parties and Public officials must be carried out in compliance with all relevant laws and consistent with the values and principles set out in Gadang's Code of Ethics and Conduct and in this Policy. As part of this commitment, all forms of bribery and corruption are unacceptable and must be avoided.

All third parties, including agents, suppliers, joint venture partners, contractors, consultants and Public officials must be made aware of this policy and the principles in Gadang's Code of Ethics and Conduct by the respective Head of Department (hereinafter referred to as "HOD") and the arrangements with them shall be subjected to clear contractual terms, including specific provisions therein requiring them to comply with minimum standards and procedures relating to bribery and corruption.

To ensure that we build a safe and healthy business relationships with third parties and Public officials, EDs and Employees shall conduct reasonable due diligence, where practical and relevant, to assess the integrity of Gadang's prospective business counterparties. EDs and Employees are not allowed to enter into any business dealings with any third party or Public officials reasonably suspected of engaging in bribery and improper business practices.

GHC will send email annually to EDs and Employees for Third Party Declaration. There will be two forms that need to be completed as below: -

- Third party Declaration Form – APPENDIX 2
- Compliance of GHB Anti Bribery & Corruption Policy by 3rd Party (If any) – APPENDIX 3

14. RAISING A CONCERN OR REPORTING A VIOLATION

14.1 REPORTING

First Step

EDs or Employees who wishes to raise a concern or report a violation of the Policy is encouraged to first discuss the matter with line managers or HOD. This is the fastest way to clear up misunderstandings and ensure good, open working environment in the Group. Most, if not all concerns, can usually be resolved through proper and timely communication.

Next Step

If notifying the line managers or HOD is not possible or inappropriate for any reason, or not in the best interest of the Group, then the EDs or Employees may raise his / her concern with the Head – Group Internal Audit, CFO or Chairman of Audit Committee. Their telephone numbers, addresses and emails are available in the Group's Whistleblowing Policy & Procedures which is posted in www.gadang.com.my.

The whistleblowing avenue is intended to be used as an ultimate remedy i.e. if no other means are available to address the concern. However, malicious and false allegations will be viewed seriously and treated as a gross misconduct and if proven, may lead to dismissal. Making a false report may result in the reporting individual being held personally liable for damages by anyone who may have been affected by the false disclosure.



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14.2 PROTECTION

If the EDs or Employees encounters any form of bribery or corruption, he / she has a duty to disclose or report such acts to the Group. For concerns that are raised in good faith i.e. with no malicious intentions, the Group will protect the EDs or Employees against detrimental action i.e. against retaliation, punishment and/or unfair treatment (including intimidation, harassment, discrimination, demotion and termination of employment) from his / her superior, head of department/division and other employees as a result of the disclosure.

15. TRAINING AND COMMUNICATION

Gadang will clearly communicate and provide training on this policy to EDs, Employees and persons associated with Gadang (including third parties). They will be asked to formally accept to comply with this policy. EDs and Employees will need to complete Acknowledgement for Compliance of Anti-Bribery & Corruption Policy included in *APPENDIX 4*.

The flowchart of Anti Bribery & Corruption policy is included in *APPENDIX 5 (EXISTING EDs & EMPLOYEES)* and *APPENDIX 6 (NEW JOINER)* and please refer to *APPENDIX 7* for flowchart of Third-Party declaration.

16. COMPLIANCE WITH THE POLICY

Gadang shall conduct regular validation to ensure compliance to this Policy. Such validation exercises may be conducted either independently by Gadang's Group Internal Audit or in collaboration with other relevant departments, and/or conducted by external consultants.

Gadang regards bribery and corruption as a serious matter. Non-compliance may lead to disciplinary action, up to and including termination of employment. Further legal action may also be taken in the event that Gadang's interests have been harmed as a result of non- compliance.

Gadang shall also notify the relevant regulatory authority of any identified bribery or corruption incidents, if it deems necessary or appropriate. Where notification to the relevant regulatory authorities have been done, Gadang shall provide full co-operation to the said regulatory authorities, including further action that such regulatory authority may decide to take against convicted EDs and Employees.

17. RESPONSIBILITY FOR THE POLICY

This Policy is reviewed and approved by the Board of Directors and oversight of this Policy has been delegated to the BRSC which monitors the effectiveness of and compliance with this Policy. EDs, Employees and persons associated with Gadang (including third parties) are responsible for understanding and complying with this Policy including prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery and corruption policy. Gadang reserves the right to terminate a contractual relationship with EDs, Employees or persons associated with Gadang (including third parties) if they breach this policy.



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18. RECORD KEEPING

Gadang will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts are subjected to Management's review and approval.

19. MONITORING AND AUDITING

Gadang's BRSC is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

Any need for improvements will be applied as soon as possible. EDs, Employees and persons associated with Gadang (including third parties) are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature must be addressed to the BRSC.

20. WAIVER

Any deviation or waiver from this Policy must be approved by the Board of Directors.

21. ACKNOWLEDGEMENT

I, _____, NRIC number: _____
acknowledge that I have read and fully understood the contents of Gadang's Anti-Bribery & Corruption Policy ("Policy"). **By signing this acknowledgement, I hereby accept and agree to full compliance to this Policy and its accompanying policies, rules and regulations.** I understand that a breach by me, of any provision of this Policy, may result in the appropriate disciplinary action being taken against me, including summary dismissal.

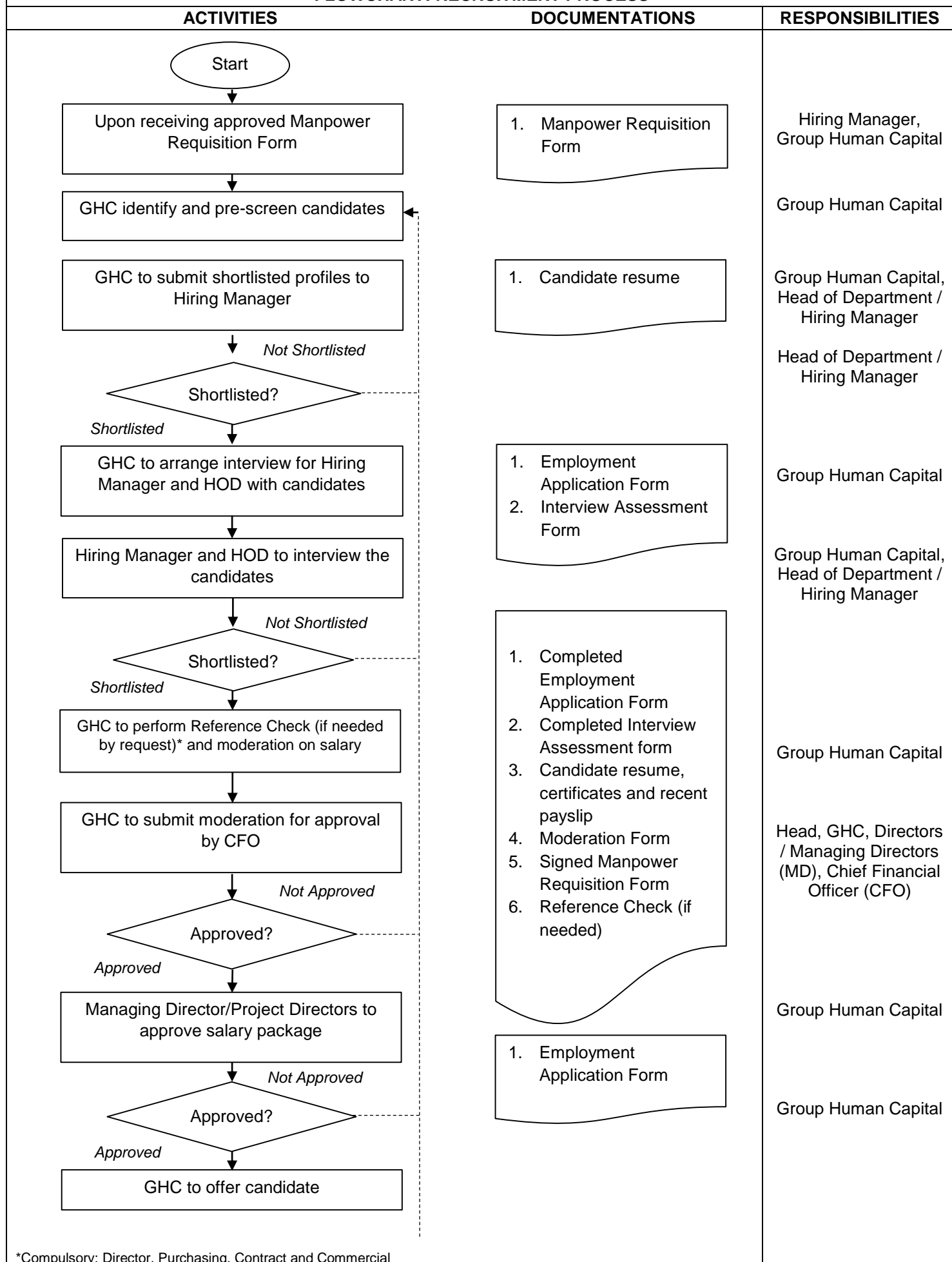
.....

Signature

.....

Date

FLOWCHART: RECRUITMENT PROCESS



*Compulsory: Director, Purchasing, Contract and Commercial

FLOWCHART: RECRUITMENT PROCESS (con't)

ACTIVITIES	DOCUMENTATIONS	RESPONSIBILITIES
<pre> graph TD A{Accept Offer?} -- Decline Offer --> D1[] A -- Accept --> B[Pre-employment medical check-up for Managerial role and above] B --> C{Medically Fit?} C -- Not fit --> D2[] C -- Fit --> E[GHC to issue offer letter] E --> F[GHC to notify Hiring Manager on candidate start date] F --> G[GHC to create new employee Personnel File] G --> H[Candidate report to work] H --> I[GHC to perform new employee induction] I --> J([End]) </pre>	<div data-bbox="820 315 1182 427">1. Medical Check-up letter</div> <div data-bbox="820 647 1182 781">1. Employment Letter 2. Annexure 1 and 2</div> <div data-bbox="820 844 1182 1308">1. Completed application form 2. Completed interview assessment form 3. Updated Resume 4. Photocopy IC, Certificates 5. Signed offer letter 6. New Employee Checklist</div>	<div data-bbox="1257 331 1517 360">Group Human Capital</div> <div data-bbox="1257 658 1525 719">Group Human Capital / Candidate</div> <div data-bbox="1257 779 1517 840">Group Human Capital, Hiring Manager</div> <div data-bbox="1257 931 1517 960">Group Human Capital</div> <div data-bbox="1257 1055 1525 1115">Group Human Capital / Employee</div> <div data-bbox="1257 1176 1525 1236">Group Human Capital / Employee</div>

GADANG GROUP OF COMPANIES

THIRD PARTY DECLARATION FORM

COMPLIANCE WITH ANTI-BRIBERY & CORRUPTION POLICY (QUARTERLY REPORT)

1. **Company:** _____
(State the name of company (GHB / GESB / GLSB / DSB / RUSB))
2. **Department:** _____
3. **Reporting Period:** _____
(Please state Jun – Aug / Sept – Nov / Dec – Feb / Mac – May and the year)
4. **Compliance with Anti-Bribery & Corruption Policy (ABC) – Checklist for areas of concern (please tick).**

Item	Description	Yes	No	Remarks
A	During the last quarter, did you engage any new third party (supplier, vendor or service provider) with transaction amount \geq RM 5,000.			
B	If you answer Yes to item A, did you get the third party to sign the Compliance of Anti-Bribery & Corruption Policy “form”.			
C	List new third party (supplier, vendor or service provider) yet to revert and acknowledge complete this form.			List: - 1) 2) 3)

5. Confirmation by Management

The undersigned confirms that this Compliance of Anti-Bribery & Corruption submission for the quarter under review is, to my knowledge, complete and accurate.

.....
(Head of Department / Division)

Name: _____

Date: _____

Kindly sign and return this form to GHC Department



Acknowledgement for Compliance of GHB Anti-Bribery & Corruption Policy by 3rd Party

I, the undersigned, am fully aware that Gadang Holdings Berhad and its subsidiaries ("**Gadang**") are committed to conduct my duty fairly and with integrity to avoid bribery and corrupt practices of all forms within Gadang's business operations pursuant to Gadang's Anti-Bribery & Corruption Policy ("**Anti-Bribery Policy**") which is available and accessible by me Gadang's website at <https://www.gadang.com.my/> ("**Gadang's Website**").

I undertake not to offer, give, solicit, accept any form of bribe or engage in any transaction that contravene the Malaysian Anti-Corruption Commission Act 2009, any applicable anti-bribery or anti-corruption legislation, by-laws, rules and regulations ("**MACC Laws**") with any of Gadang's employee and shall fully comply with the Anti-Bribery Policy during the course of our engagement with Gadang.

In the event third party solicit or request any form of bribe from me, I shall inform Gadang via the whistleblowing channel in the manner and form as provided under Gadang's Whistleblowing Policy & Procedure which is available and accessible at Gadang's Website.

In the event that I am found by the court of law to be in breach of the MACC Laws during the course of employment, I agree that Gadang shall have the absolute rights to take the necessary actions against me and I shall be liable to fully indemnify Gadang against any claims, fines, losses and/or damages suffered by Gadang arising from and out of our breach therein.

Yours truthfully,

Signature

Name : _____

NRIC NO. : _____

Company Name : _____

Position : _____

Date : _____



ACKNOWLEDGEMENT FOR COMPLIANCE OF ANTI-BRIBERY & CORRUPTION POLICY

Name			
NRIC NO.		Company	
Position		Date	

I am fully aware that Gadang Holdings Berhad and its subsidiaries ("**Gadang**") are committed to conduct my duty fairly and with integrity to avoid bribery and corrupt practices of all forms within Gadang's business operations pursuant to Gadang's Anti-Bribery & Corruption Policy ("**Anti-Bribery Policy**") which is available and accessible by me Gadang's website at <https://www.gadang.com.my/> ("**Gadang's Website**").

I undertake not to offer, give, solicit, accept any form of bribe or engage in any transaction that contravene the Malaysian Anti-Corruption Commission Act 2009, any applicable anti-bribery or anti-corruption legislation, by-laws, rules and regulations ("**MACC Laws**") with any of Gadang's employee and shall fully comply with the Anti-Bribery Policy during the course of our engagement with Gadang.

In the event third party solicit or request any form of bribe from me, I shall inform Gadang via the whistleblowing channel in the manner and form as provided under Gadang's Whistleblowing Policy & Procedure which is available and accessible at Gadang's Website.

In the event that I am found by the court of law to be in breach of the MACC Laws during the course of employment, I agree that Gadang shall have the absolute rights to take the necessary actions against me and I shall be liable to fully indemnify Gadang against any claims, fines, losses and/or damages suffered by Gadang arising from and out of our breach therein.

DECLARATION

I acknowledge that I have read and fully understood this content. By signing this acknowledgement, I hereby accept and agree to full compliance to this policy and its accompanying policies, rules and regulations.

Signature: _____

Date: _____

FLOWCHART: ANTI BRIBERY & CORRUPTION POLICY “EXISTING EDs & EMPLOYEES”

ACTIVITIES	DOCUMENTS	RESPONSIBILITIES
<pre> graph TD Start([Start]) --> A[GHC (C&B) will send email to all existing EDs and Employees annually for “Acknowledgement for Compliance of Anti-Bribery & Corruption Policy” (ABC Policy can be accessed in GHB Share Point)] A --> B[Staff to read and understand the ABC Policy] B --> C[Staff to declare and submit via google form] C --> D[GHC will download result] D --> E[GHC will collect and keep in the file to ensure clear communication] E --> End([End]) </pre>	<div data-bbox="751 551 1171 792"> 1. Acknowledgement for Compliance of Anti-Bribery & Corruption Policy </div>	<p>Group Human Capital / EDs / Employees</p> <p>EDs / Employees</p> <p>EDs / Employees</p> <p>Group Human Capital</p> <p>Group Human Capital</p>

FLOW CHART: ANTI BRIBERY & CORRUPTION POLICY “NEW JOINER”

ACTIVITIES	DOCUMENTS	RESPONSIBILITIES
<p>Start</p> <p>New Joiner on board</p> <p>GHC (Recruitment) will provide:</p> <ol style="list-style-type: none"> 1. Anti Bribery & Corruption (“ABC”) Policy 2. ABC Policy Acknowledgement <p>New Joiner will go through ABC Policy</p> <p>New Joiner Q&A session</p> <p>GHC (Recruitment) will check completeness of ABC Policy & ABC Policy acknowledgement form returned</p> <p>Completed form will be kept in Employee Personal File</p> <p>End</p>	<ol style="list-style-type: none"> 3. Anti-Bribery & Corruption (“ABC”) Policy 4. ABC Policy Acknowledgment <ol style="list-style-type: none"> 1. Anti-Bribery & Corruption (“ABC”) Policy <ol style="list-style-type: none"> 1. Anti-Bribery & Corruption (“ABC”) Policy 2. ABC Policy Acknowledgment 	<p>Group Human Capital</p> <p>New Joiner</p> <p>New Joiner</p> <p>Group Human Capital</p> <p>Group Human Capital</p>

FLOWCHART: THIRD PARTY

