



PLENITUDE BERHAD ANTI-CORRUPTION POLICY

This document is issued pursuant to subsection (5) of section 17A of the Malaysian Anti-Corruption Commission Act 2009 (Act 694) ("MACC Act 2009"), as stated in the Malaysian Anti-Corruption Commission (Amendment) Act 2018 ("Amendment Act 2018").

The provision of section 17A under MACC Act 2009 (Amendment Act 2018) establishes the principle of a criminal liability (corporate liability) for the corrupt practices of its employees and/ or any person(s) associated with the organisation in cases where such corrupt practices are carried out for the organisation's benefit or advantage.

Plenitude Berhad ("Plenitude") is committed to conducting its business with integrity and has put in place an Anti-Corruption Policy to ensure that the business operations are carried out professionally in accordance with business ethics and conduct and recognise that all business partners, employees and directors of Plenitude have to adhere to the terms of this policy.

The policy applies to all employees of Plenitude. It also applies to external parties providing services to Plenitude such as the suppliers/contractors, advisors, consultants, internal and external auditors and Board members ("stakeholders").

1. Plenitude condemns any form of bribery or corruption. Stakeholders are advised to take necessary measures to prevent any corrupt practices in its dealings with Plenitude and Plenitude Group of Companies.
2. Stakeholders are encouraged to report any suspected instances of corruption or attempted corruption to Plenitude through its official channels as stipulated in Plenitude's Whistleblowing Policy.
 - All reports of suspected instances of corruption or attempted corruption are to be made to the Audit Committee Chairman and/or the Company Secretary via written letter.
 - Letter should be addressed to the "Audit Committee Chairman" and/or "The Company Secretary" and sent to the following address: -

Plenitude Berhad
2nd Floor, No. 2, Jalan Sri Hartamas 8
Sri Hartamas, 50480 Kuala Lumpur
Malaysia

Email: wb@plenitude.com.my
3. Stakeholders shall not –
 - Offer or provide, directly or through any intermediaries, any bribe, gift, reward, consideration, favour or any other advantage, whether material or immaterial to any representative of Plenitude for the Purpose of:
 - i. Influencing them to act contrary to Plenitude interests; or
 - ii. Obtaining or rewarding favourable treatment by Plenitude with respect to the terms, conditions, price or performance of a contract.



- Offer or provide advantages which might be considered a bribe under international legislation to any representative of Plenitude, either in Malaysia or any other country.
 - Instigate third parties to perform actions pertaining to the above.
4. Stakeholders are encouraged to adhere to the following-
- Gifts
 - i. Employees are prohibited from receiving or asking for gifts from external parties.
 - ii. Any gift must be unsolicited and not affect, or be perceived as affecting business judgment. Gifts should only be offered to and received in connection with a customary business or cultural occasion. Cash, loans and kickbacks are strictly prohibited.
 - iii. no gift shall be given to government officials on Plenitude's behalf.
 - Scholarships, grants, charitable contributions and non-commercial sponsorships.
 - i. Plenitude may offer this to support the advancement of knowledge in technology, environmental, social, governance or to support other socially beneficial purposes. This may be in the form of cash donations, contribution of goods & services and/or other form of contribution which is part of Plenitude's Corporate Social Responsibility initiatives.
 - ii. All requests must be made by well-established organisations on their official letterheads to Plenitude's Corporate Welfare Department.
 - Political Contributions
 - i. Plenitude does not contribute to any political parties or candidates.
 - Dealings with associates & third parties
 - i. Plenitude's dealings with contractors, suppliers, agents, consultants, joint venture partners, introducers, operators etc, must be carried out in compliance with all relevant laws and be consistent with the values and principles of Plenitude's Anti-Corruption Policy.
 - ii. Thorough due diligence and background checks on all associates and & third parties, where practical and relevant, must be carried out before any engagement can be made. Plenitude will not enter into any business dealings with any parties that may be reasonably suspected of engaging in bribery and improper business practices.
 - iii. All third parties are to be made aware of Plenitude's Anti-Corruption Policy and expectations of them.
 - iv. Constant monitoring will be conducted especially on contractors and suppliers as part of their regular review of performance. Plenitude has the right to terminate their services in the event that these parties pay bribes or act in the manner which is inconsistent with the Anti-Corruption Policy.

The Board of Directors of Plenitude adopted this policy on 29 June 2020