

# Anti-Corruption and Bribery Policy

## 1. Introduction

The Board of Directors (the “Board”) of Bright Packaging Industry Berhad and its subsidiaries has established and adopted this Anti-Corruption and Bribery Policy (“Policy”). Bright Packaging Industry Berhad Group is committed to conducting the business ethically, as well as complying with all applicable laws, which include compliance with the Malaysian Anti-Corruption Commission Act 2009 and the Malaysian Anti-Corruption Commission (Amendment) Act 2018 and any of its amendments or re-enactments that may be made by the relevant authority from time to time.

The provision of section 17A under MACC Act 2009 (Amendment Act 2018) established the principle of an organisation’s criminal liability (corporate liability) for the corrupt practices of its associated persons (i.e. the director, partner or an employee of the organisation or the person who performs services for or on behalf of the organisation) where such corrupt practices are carried out for the organisation’s benefit or advantage; whilst the organisation does not have adequate policy/ procedures on anti-corruption in place.

This Policy provides principles, guidelines and requirements on how to deal with bribery and corrupt practices that may arise in the course of daily business and operation activities within “the company”.

Unless otherwise stated, any references to “we”, “us” and “our” in this Policy are to our Company and our subsidiaries taken as a whole.

## 2. Purpose

The purpose of this Policy is to:

2.1 Set out our responsibilities to comply with laws against bribery and corruption; and

2.2 Provide information and guidance to those working for “the company” on how to recognize and deal with corruption and bribery issues.

## 3. Scope and Application

This Policy applies to all individuals working for Bright Packaging Industry Berhad and all subsidiaries companies within the “the company” at all levels and grades.

This includes employees, senior managers, managers and all individual working at all levels and grades (collectively the “Employees”) and the Board (whether full time, part-time, contract or temporary) and any third parties associated with us.

In this Policy, the associated third parties shall refer to any individual or organization that an associate may come into contact during the course of his/her engagement with the “the company”, which may include but not limited to suppliers, contractors, agents, consultants, outsourced personnel, distributors, advisers, government and public bodies including their advisors, representatives and officials (hereafter together defined as “Associated Third Parties”).

#### **4. Our Principles**

4.1 We take a zero-tolerance approach to corruption and bribery.

4.2 We conduct all of our business in an honest and ethical manner. We are committed to acting professionally, fairly and with integrity in all our relationships and business dealings in accordance with our Code of Business Conduct and Ethics Policy, and to implement and enforce effective system to counter bribery.

4.3 We will uphold all laws relevant to countering corruption and bribery. We remain bound by the laws of Malaysia, including the Malaysian Anti-Corruption Commission Act 2009 and the Malaysian Anti-Corruption Commission (Amendment) Act 2018 and any of its amendments or re-enactments that may be made by the relevant authority from time to time in respect of our conduct both at home and abroad.

4.4 To address these risks, we have taken the following steps:

- a) Implement this Policy;
- b) Perform regular corruption risk assessment on our operations and review findings;
- c) Take steps to implement training programmes for all individuals operating in areas of the organization that are identified as high risk;
- d) Regular review and update to this policy.

#### **5. Facilitation Payment and Kickbacks**

5.1 We do not make and will not accept Facilitation Payments or Kickbacks of any kind. All associates must avoid any activity that might lead to Facilitation Payments or Kickbacks being made or accepted.

5.2 Any individual with any suspicious, concerns or queries regarding a payment made on our behalf or improper business practices, he or she should raise these by reporting to the Company via the channel as outlined in our Whistleblowing Policy.

#### **6. Associated Third Parties and Procurement Process**

6.1 We had processes and adheres to the system of internal controls on supplier selection. Supplier selection should never be based on receipt of the Gifts, Benefits or Entertainment.

6.2 Bidding process is open to all qualified bidders and no parties having the unfair advantage of separate, prior, close-door negotiations for a contract.

6.3 Selection of supplier shall subject to clear adherence to this Policy and compliance with Bright Packaging Industry Berhad Code of Business Conduct and Ethics.

6.4 Appropriate assessment shall be conducted to individuals or third parties to ensure the business and background of the potential business partners are free from bribery elements or conflict of interest prior to procurement process.

#### **7. Political Donations and contribution**

7.1 We do not make charitable donations or contributions to political parties. Whilst our Employees and the Associated Third Parties acting in their personal capacity as citizens are not restricted to make any personal political donations, "the company" will not make any reimbursement for these personal political contributions back to its Employees or the Associated Third Parties.

## **8. Sponsorships, Donations, and Contribution to Charity or Social Projects**

10.1 Contributions or donations made by “the company” Group to community projects or charities need to be made in good faith and in compliance with Bright Packaging Industry Berhad Code of Business Conduct and Ethics, this Policy and all relevant “the company” policies and procedures.

10.2 Bright Packaging Industry Berhad property, facilities, services or employee time can not be used for or contributed to any political party or candidate for public office without approval by the Chairman or Executive Director.

10.3 No donation should be made which may or may be perceived to breach applicable law or any other sections of this Policy.

## **11. Responsibilities**

11.1 The Board has oversight of this Policy. The GM and HOD are responsible for ensuring the compliance with this Policy. Every manager and employee is required to be familiar with and comply with this Policy.

11.2 We have a zero-tolerance approach to corruption and bribery. Any violation of this Policy will be regarded as serious matter and will result in disciplinary action, including dismissal and termination in accordance with local law.

11.3 Any individual and employee with any suspicious, concerns or believes regarding a violation with this Policy has occurred or may occur in future, should raise up, notify and shall make report to the Company via the channel outlined in our Whistleblowing Policy.

11.4 An employee will be accountable individually whether he or she pays a bribes himself or herself or whether he or she authorizes, assists or conspires with someone else to violate this Policy and/or an anti-corruption or anti-bribery. Punishment for violating the law are against him or her as an individual and may include imprisonment, probation, mandated community service and monetary fines and others which will not be paid by “the company”.

## **12. Record Keeping**

12.1 We must keep all financial records and have appropriate internal controls in place which will evidence, substantiate and justify that business reason for making payments to, and receiving payments from, third parties.

12.2 We must ensure all expenses claims relating to gifts or entertainment made to third parties are submitted in accordance with the Company’s reimbursement procedures and/or applicable policy and specifically record the reason for such expenditure. All the parties shall further ensure that all expense claims shall comply with the terms and conditions of this Policy.

12.3 All documents, accounts and records relating to dealings with third parties, such as customers, suppliers and business contracts, should be prepared and maintained with strict accuracy and completeness. No accounts should be kept “off-book” to facilitate or conceal improper payments

### **13. Confidentiality and Protection**

13.1 Individuals who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

13.2 We are committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in corruption, or because of reporting concerns under this Policy in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

### **14. Communication and Training**

14.1 Bright Packaging Industry Berhad will on a continuing basis provide specific and regular training on this Policy, and on anti-corruption and bribery laws and on how to implement and comply with this Policy, for all new and existing Employees.

14.2 Our zero-tolerance approach to corruption and bribery must be communicated to all the Associated Third Parties at the outset of our business relationship with them and as appropriate thereafter. Wherever possible, all the Associated Third Parties should be sent a copy of this Policy at the outset of the business relationship or shall always refer to this Policy published on our Company website.

### **15. Monitoring and Review**

15.1 All the Employees and the Associated Third Parties are responsible for the success of this Policy and should ensure adherence to this Policy and use it to disclose any suspected danger or wrongdoing.

15.2 Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering corruption and bribery.

15.3 This Policy does not form part of the associates' contract of employment and it may be amended at any time by the Company even though all the Employees and the Associated Third Parties are welcome to comment on this Policy and suggest ways in which it might be improved.