



**ORIENTAL INTEREST BERHAD**  
199301017406 (272144-M)

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## **ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

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## **1. Introduction**

Oriental Interest Berhad and its subsidiaries (“OIB Group” or “the Group”) has adopted zero tolerance policy against all forms of bribery and corruption. The Group is committed to conducting its business ethically and in compliance with all laws and regulations including the Malaysian Anti-Corruption Commission Act 2009 and the Malaysian Anti-Corruption (Amendment) Act 2018 (collectively “the MACC Act”). The Anti-Bribery and Anti-Corruption Policy (hereinafter referred to as “this Policy”) is in line with the core principles set out in the Group’s Code of Ethics and Conduct.

This Policy is not intended to provide definitive answers to all questions regarding bribery and corruption. Rather, it serves as a guidance to the employees on how the Group combats bribery and corruption in tandem with the Group’s commitment to lawful and ethical behavior whilst strengthening the trust of stakeholders and shareholders.

According to the MACC Act, bribery and corruption are criminal offences and the legal consequences include fine of not less than ten times the sum or value of gratification which is the subject matter of the offence or one million, whichever is higher, and/or imprisonment of up to twenty (20) years. A commercial organisation commits an offence if an associated person corruptly gives any gratification with intent to obtain or retain business or an advantage in the conduct of business, for the commercial organisation. “Gratification” means:

- (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;
- (b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- (c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- (d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- (e) any forbearance to demand any money or money’s worth or valuable thing;
- (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
- (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).

## **2. Scope**

This Policy is applicable to anyone who is employed by or work at OIB Group (whether full-time, probationary, part-time, contract or interns) and directors (executive and non-executive). It is also applicable OIB Group's dealing with third parties which include customers, contractors, sub-contractors, consultants, suppliers, vendors, solicitors, agents, joint venture partners, introducers/government intermediaries and service providers of any kind performing work or services, for or on behalf of the Group. Associated companies are encouraged to adopt these or similar principles and standards.

## **3. Guidelines**

### **3.1 Gifts and Hospitality**

**3.1.1** OIB Group does not solicit gifts, hospitality and favours of any value from any person, nor does the Group act in a manner that would place any person in a position where he may feel obligated to make a gift or provide hospitality or a favour to the Group and/or any associated person in order to do business or continue to do business with the Group.

**3.1.2** However, OIB Group advocates the use of good judgement when giving or receiving gifts and hospitality in the course of the Group's business activities. Corporate gifts, festive or ceremonial gifts may be given or received provided it is in compliance with the law and must be in accordance with the Group's Policy such as the following:

- i. Right purpose and intention;
- ii. Reasonably valued;
- iii. Infrequent in nature;
- iv. Transparent and documented;
- v. Must not have the ability to influence or gain improper advantages.

### **3.2 Facilitation Payments**

**3.2.1** Facilitation payment can be defined as any payment made to public or government officials with the intention to smoothen a process or expedite the routine or administrative duty or governmental transactions which the payer is in general entitled. It can also be any sort of benefits with the intention to influence them in their duties. Offering, promising or requesting facilitation payments is just as prohibited as actually paying facilitation payments.

**3.2.2** OIB Group adopts a strict stance that disallows facilitation payment of any nature. In Malaysia, facilitation payment is illegal and is seen as a form of corruption. Therefore, facilitation payments are strictly prohibited under this Policy.

**3.2.3** Despite its strict policy on facilitation payments, the Group recognises that, there may be occasion where the employee is forced to make facilitation payments if his safety is at stake. Under these circumstances, the employee must immediately report the incident to Chief Executive Officer or in his absence, the Chief Financial Officer of the Group for the necessary action to be taken.

- 3.2.4** Any person who has any suspicion and concern regarding any such payments made to any director or employee of the Group should raise his concern to the Chairman of the Audit Committee of OIB Group or through the Whistleblowing channel if he wishes to do so anonymously.

### **3.3 Political Contributions**

- 3.3.1** No contributions, whether in cash, donation or by any other means shall be made to support any political parties or candidates so as to avoid any perception that such payments are being made as an attempt to gain an improper business advantage.
- 3.3.2** Directors and employees may participate in political activities or make their own personal political contributions in their own individual capacity with their own fund. However, no reimbursement will be made for their personal political contributions. Their individual political views and actions are personal and are not representative of OIB Group.

### **3.4 Donations and Sponsorships**

- 3.4.1** OIB Group will only provide donations and sponsorships to non-political organisations through legal and proper channels. Such donations and sponsorships must be made in good faith without any expectation of a reciprocal benefit or to influence the outcome of a business decision or cause others to perceive it as such.
- 3.4.2** All donations and sponsorships must be approved in accordance with standard operating procedures. For donations and sponsorships that allow the display of the Group's brand name and logo, it shall be treated as advertising and promotional expenses incurred in the ordinary course of the Group's business.

### **3.5 Internal Audit**

- 3.5.1** OIB Group's internal audit function is performed in-house by the Internal & Compliance Department that provide assurance to the ARMC that OIB Group is operating effectively in preventing and detecting fraud and bribery, and to provide a deterrent to any potentially corrupt personnel.
- 3.5.2** The internal audit is to be carried out based on risk-based approach on a quarterly basis on significant risks identified together with proposed strategies and plans to address them. After deliberation, the ARMC will report to the Board of Directors for consideration on the adequacy of the proposed approach to manage the risks identified by internal auditors.

### **3.6 Record-keeping**

- 3.6.1** All accounts, invoices, letters, agreements, and other documents relating to transactions and dealings between OIB Group and external parties shall be maintained and kept with accuracy and completeness.

**3.6.2** No accounts must be kept off the records or off the books to facilitate or conceal improper payments.

**3.6.3** All claims for reimbursement of expenses incurred by any director and employee whilst dealing with any external party relating to gifts, hospitality, donations and sponsorships must be submitted and processed in accordance with the Group's Policy.

### **3.7 Training and Communication**

**3.7.1** This Policy is a public document which shall be communicated to all directors and employees of the Group as well as to third parties dealing with OIB Group.

**3.7.2** All employees of OIB Group regardless of position shall be made aware of such requirements and at any given time, understand and comply with the relevant laws and regulations and adherence to the Policy.

## **4. Responsibilities**

**4.1** The Board has oversight of this Policy and Chief Executive Officer is responsible for ensuring compliance with this Policy by his subordinates. Every director and employee of the Group is required to be familiar with and comply with this Policy.

**4.2** All employees of the Group are responsible for the prevention, detection, and reporting of bribery and other forms of corruption that he becomes aware of. Any activities that could lead to, or imply a breach of this Policy should be avoided so as not to expose the Group nor themselves to the risk of liability under the MACC Act or any other similar laws in jurisdictions where OIB Group operates its businesses.

**4.3** Employees who have reasons to believe or suspect that a violation of this Policy has been committed must immediately notify the Chairman of Audit Committee of the Group. No retaliatory action of any kind will be permitted against anyone for making such a report in good faith.

**4.4** Any violation of this Policy will be regarded as a serious offence and is likely to result in disciplinary action, including dismissal, termination of contract or termination of service being taken by the Group in accordance with the relevant laws.

## **5. Review**

This Policy will be updated, amended, or revised from time to time to ensure its adequacy in implementation and enforcements.