



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. INTRODUCTION

PLB Engineering Berhad (“**PLB**”) and its subsidiaries (“**the Group**”) are committed to conducting business dealings with integrity, in a legal and ethical manner. The Group requires all employees (including full time, probationary, contract and temporary staff) (“**Employees**”) and Directors of the Group (“**Directors**”) to be committed to acting professionally and with integrity in their business dealings. The Group will take reasonable and appropriate measures to ensure that its businesses do not participate in corrupt activities for its advantage or benefit.

This Anti-Bribery and Anti-Corruption Policy (“**Policy**”) sets out the parameters to prevent the occurrence of bribery and corrupt practices in relation to the business of the Group. This Policy is supplemental to, and shall be read in conjunction with the *Code of Conduct & Ethics & Whistle-Blowing Policy* of PLB

2. OBJECTIVE

The objective of the Policy is to provide information and guidance to the Directors and Employees working for the Group on standards of behaviour to which they must adhere to and how to recognise as well as deal with bribery and corruption.

This Policy is not intended to be exhaustive and there may be additional obligations that Directors and Employees are expected to adhere to or comply with when performing their duties. For all intents and purposes, the Directors and Employees shall always observe and ensure compliance with all applicable laws, rules and regulations to which they are bound to observe in the performance of their duties.

3. APPLICABILITY

This Policy is applicable to all Directors and Employees of the Group. Each Director and Employee has a duty to read and understand the Policy. Violation of any of the Policy’s provisions may result in disciplinary action, including termination of employment.

4. COMMON FORMS OF BRIBERY AND CORRUPTION

4.1 Bribery

Bribery is an inducement or reward offered, requested, promised or provided with the intent to obtain or retain any commercial, contractual, regulatory, business or personal advantage in the conduct of business for the Group.

4.2 Gifts and Hospitality

Gifts can be in the form of goods or services, including anything that can be of value to the person receiving it.

Hospitality includes providing meals, refreshment, travel, transportation, lodging, as well as entertainment in the context of conventional, cultural and sporting events.

Giving or receiving gifts or hospitality is often an important part of maintaining and developing business relationships. However, all gifts and hospitality should be for a genuine purpose, reasonable and given in the ordinary course of business.



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As a general principle, the Directors and Employees should not accept or give a gift 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. The Directors and Employees should be mindful in giving or receiving gifts or hospitality as it could be perceived as a way of improperly influencing the decision making of the recipient. Hence, the intention behind the gifts or hospitality should always be considered.

4.3 Facilitation Payments or Kickbacks

The Group and its service providers should not make, nor accept, facilitation payments or kickbacks of any kind. Facilitation payments are unofficial payments, no matter how small, made to public official in order to secure, expedite actions or increase the speed at which they do their job. All employees and service providers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback is made or accepted by the Group.

There may be occasion where you are forced to make facilitation payments in order to protect your life, limb or liberty. In such occasion, you must immediately report the incident to the Director(s) for the necessary action to be taken.

4.4 Charitable Contribution and Sponsorship

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time or direct financial contributions. However, the Group will only provide charitable or educational donations and public welfare sponsorships if they are ethical and legal under applicable laws. All donation and sponsorship must be done with the approval of the executive director(s) and it must be done in a transparent manner for social and moral responsibility.

It should never be paid in exchange for any business implications to the Group, whether it is to obtain a business, or to obtain some form of advantage of the business of the Group.

Directors and Employees of the Group should not agree or promise to provide any form of political donation or support particularly where it is to obtain any business or advantage to the Group. Any requests for political donations should be brought to the attention of the Director(s) immediately.

5. RECORD KEEPING

It is important that proper and complete records be maintained of all payments made to third parties in the usual course of businesses as these would serve as evidence that such payments were bona fide, and not linked to corrupt and/or unethical conduct. The Group should:-

- Ensure that all expense claims relating to hospitality, gifts or expenses incurred are submitted and specifically record the reason for the expenditure;
- Prepare and maintain with strict accuracy and completeness for all accounts, invoice and other similar documents and records related to dealings with Third Parties.

6. COMPLIANCE TO THE LAW

The Group will comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions within which the Group operates. Directors and Employees are expected to understand and comply with the Malaysian Anti-Corruption Commission Act 2009 (including any amendment thereof). The Group reserves the right to



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report any actions or activities suspected of being criminal in nature to the police or other relevant authorities.

7. RAISING CONCERN

Any Employee who knows of, or suspects, a violation of the Policy, is encouraged to whistle blow or report the concerns through the mechanism set out under the Group's *Code of Conduct & Ethics & Whistle-Blowing Policy*. The provision, protection and procedure of the *Code of Conduct & Ethics & Whistle-Blowing Policy* for reporting of the violations of the Policy is available on PLB website. No individual will be discriminated against or suffer any sort or manner of retaliation for raising genuine concerns or reporting in good faith on violations or suspected violations of the Policy. All reports will be treated confidentially.

However, if for any reason an Employee is reluctant to do so, then he/she should report his/her concern in writing by email or speak in confidence to the Executive Directors of the Company.

8. REPORTING AND INVESTIGATION

The Group will investigate any report made internally or verbally. All reports will be handled confidentially. The investigation will document all relevant facts, including persons involved, times and dates.

Employees who raised concerns will be contacted if any further assistance is required and will be informed of who is handling the matter. Employees' identities will not be disclosed without prior consent. Where concerns cannot be resolved without revealing the identity of the employee raising the concern, the Group will enter into dialogue with the employee concerned as to whether and how it can proceed.

Recommended actions will be taken in light of the outcome of the investigation, including disciplinary steps where appropriate, action to correct any behavior in breach of this policy or other unfavorable treatment connected with raising a concern.

9. TRAINING

Training on awareness of this Anti-corruption policy and standard operating procedures and its compliance forms part of the induction process for all new employees, officers and directors. All employees, officers and directors shall receive relevant training on how to implement and adhere to this policy.

Agents or representatives of the Group who are consultants, independent contractors, external agencies or any other party with a business relationship with the Group will be informed of this Anti-Corruption Policy.

10. REVIEW OF THE POLICY

The Group monitors the effectiveness and reviews the implementation of this Policy at appropriate intervals, considering its suitability, adequacy and effectiveness. Any improvement identified is made as soon as possible. Internal control systems and procedures are also subject to regular reviews to provide assurance that they are effective in countering any risks of corruption.