

DATED : 26 AUGUST 2020

ANGLO-EASTERN PLANTATIONS MANAGEMENT SDN BHD

ANGLO-EASTERN PLANTATIONS (M) SDN BHD

and

ALL FOR YOU SDN BHD

Anti-Corruption And Bribery Policy

ANTI-CORRUPTION AND BRIBERY POLICY

Ethical Commitment

1. The ANGLO-EASTERN PLANTATIONS MANAGEMENT SDN BHD, ANGLO-EASTERN PLANTATIONS (M) SDN BHD and ALL FOR YOU SDN BHD (“AEP Malaysia Companies”) regards honesty, integrity and fair play as our core values that must be upheld by all directors and staff¹ of the Company at all times. This Code sets out the basic standard of conduct expected of all directors and staff, and the Company’s policy on acceptance of advantage and handling of conflict of interest when dealing with the Company’s business.

Prevention of Bribery

2. The Company prohibits all forms of bribery and corruption. All directors and staff are prohibited from soliciting, accepting or offering any bribe in conducting the Company’s business or affairs, whether in Malaysia or elsewhere. In conducting all business or affairs of the Company, they must comply with the provisions of the Malaysian Anti-Corruption Commission Act 2009 (Annex 1) and must not:
 - a) solicit or accept any advantage from others as a reward for or inducement to doing any act or showing favour in relation to the Company’s business or affairs, or offer any advantage to an agent of another as a reward for or inducement to doing any act or showing favour in relation to his principal’s business or affairs;
 - b) offer any advantage to any public servant (including government / public body employee) as a reward for or inducement to his performing any act in his official capacity or his showing any favour or providing any assistance in business dealing with the Government / a public body; or
 - c) offer any advantage to any staff of a Government department or public body while they are having business dealing with the latter.
3. Bribery is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage. Corruption is the abuse of entrusted power or position for private gain.

Acceptance of Advantage

4. It is the Company’s policy that directors and staff should not solicit or accept any advantage for themselves or others, from any person, company or organisation having business dealings with the Company or any subordinate, except that they may accept (but not solicit) the following when offered on a voluntary basis:
 - a) advertising or promotional gifts or souvenirs of a nominal value; or
 - b) gifts given on festive or special occasions, subject to a maximum limit of RM250.00 in value; or
 - c) discounts or other special offers given by any person or company to them as customers, on terms and conditions equally applicable to other customers in general.

¹ “Staff” cover full-time, part-time and temporary staff, except where specified

² Specify the position of the approving authority in the Code and the Form

5. Gifts or souvenirs described in paragraph 3(a) that are presented to directors and staff in official functions are deemed as offers to the Company. The directors and staff concerned should report the acceptance to the Company and seek direction as to how to handle the gifts or souvenirs from the **approving authority**² using Form A (Annex 2). If a director or staff member wishes to accept any advantage not covered in paragraph 3, he/she should also seek permission from the approving authority using Form A. The approving authority for AEP Malaysia Companies is MR CHUA HWA PHUAY.
6. However, a director or staff member should decline an offer of advantage if acceptance could affect his/her objectivity in conducting the Company's business or induce him/her to act against the interest of the Company, or acceptance will likely lead to perception or allegation of impropriety.
7. If a director or staff member has to act on behalf of a client in the course of carrying out the Company's business, he/she should also comply with any additional restrictions on acceptance of advantage that may be set by the client (e.g. directors and staff members performing any duties under a government or public body contract will normally be prohibited from accepting advantages in relation to that contract).

Offer of Advantage

8. Directors and staff are prohibited from offering advantages to any director, staff member or agent of another company or organisation, for the purpose of influencing such person in any dealing, or any public official, whether directly or indirectly through a third party, when conducting the Company's business. Even when an offer of advantage carries no intention of improper influence, it should be ascertained that the intended recipient is permitted by his employer/principal to accept it under the relevant circumstance before the advantage is offered.

Entertainment

9. Although entertainment is an acceptable form of business and social behaviour, a director or staff member should avoid accepting lavish or frequent entertainment from persons with whom the Company has business dealing (e.g. suppliers or contractors) or from his/her subordinates to avoid placing himself/herself in a position of obligation.

Records, Accounts and Other Documents

10. Directors and staff should ensure that all records, receipts, accounts or other documents they submit to the Company give a true representation of the facts, events or business transactions as shown in the documents. Intentional use of documents containing false information to deceive or mislead the Company, regardless of whether there is any gain or advantage involved, may constitute an offence under the MACC Act 2009.

Compliance with Laws of Malaysia and in Other Jurisdictions

11. Directors or staff must comply with all local laws and regulations when conducting the Company's business, and also those in other jurisdictions when conducting business there or where applicable.

Conflict of Interest

12. Directors and staff should avoid any conflict of interest situation (i.e. situation where their private interest conflicts with the interest of the Company) or the perception of such conflicts. When actual or potential conflict of interest arises, the director or staff member should make a declaration to the approving authority through the reporting channel using Form B (Annex 3).

13. Some common examples of conflict of interest are described below but they are by no means exhaustive:
- a) A staff member involved in a procurement exercise is closely related to or has financial interest in the business of a supplier who is being considered for selection by the Company.
 - b) One of the candidates under consideration in a recruitment or promotion exercise is a family member, a relative or a close personal friend of the staff member involved in the process.
 - c) A director of the Company has financial interest in a company whose quotation or tender is under consideration by the Board.
 - d) A staff member (full-time or part-time) undertaking part-time work with a contractor whom he is responsible for monitoring.

Misuse of Official Position, Company Assets and Information

14. Directors and staff must not misuse their official position in the Company to pursue their own private interests, which include both financial and personal interests and those of their family members, relatives or close personal friends.
15. Directors and staff in charge of or having access to any Company assets, including funds, property, information, and intellectual property, should use them solely for the purpose of conducting the Company's business. Unauthorised use, such as misuse for personal interest, is strictly prohibited.
16. Directors and staff should not disclose any classified information of the Company without authorisation or misuse any Company information (e.g. unauthorised sale of the information). Those who have access to or are in control of such information, including information in the Company's computer system, should protect the information from unauthorised disclosure or misuse. Special care should also be taken in the use of any personal data, including directors', staff's and customers' personal data, to ensure compliance with Personal Data Protection Act 2012.

Outside Employment

17. If a staff member wishes to take up employment outside the Company, he must seek the prior written approval of the approving authority. The approving authority should consider whether the outside employment would give rise to a conflict of interest with the staff member's duties in the Company or the interest of the Company.

Relationship with Suppliers, Contractors and Customers Gambling

18. Directors and staff are advised not to engage in frequent social activities (e.g. after office hours meetings in clubs, restaurants or lounges unless it is at the business premises of the other person and is his company's official function or event) with persons having business dealings with the Company.

Loans

19. Directors and staff should not accept any loan from, or through the assistance of, any individual or organisation having business dealings with the Company. There is however no restriction on borrowing from licensed banks or financial institutions.

Compliance with the Code

20. It is the responsibility of every director and staff member of the Company to understand and comply with this Code, whether performing his duties of the Company in or outside Malaysia. Managers and supervisors should also ensure that the staff under their supervision understand well and comply with this Code.

21. Any director or staff member in breach of this Code will be subject to disciplinary action, including termination of appointment. Any enquiries about this Code or reports of possible breaches of this Code should be made to (post of a designated senior staff member). In cases of suspected corruption or other criminal offences, a report should be made to the appropriate authority.

How to raise a concern

22. You are encouraged to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage.
23. If you are offered a bribe, or are asked to make one, or if you believe or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify MR LIM TIAN HUAT it in accordance with our Whistleblowing Policy as soon as possible.
24. If you are unsure about whether a particular act constitutes bribery or corruption, raise it with your manager or through the confidential helpline.

Protection

25. Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
26. We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Mechanism, which can be found at AEP Plc's website under Workers' Rights and Safety - Whistle-Blowing Policy and Grievance Mechanism.

Training and communication

27. Training on this policy forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
28. Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

Extracts of the Malaysian Anti-Corruption Commission Act 2009

Offence of accepting gratification

Section 16.

Any person who by himself, or by or in conjunction with any other person-

- a) corruptly solicits or receives or agrees to receive for himself or for any other person; or
- b) corruptly gives, promises or offers to any person whether for the benefit of that person or of another person,

any gratification as an inducement to or a reward for, or otherwise on account of-

- A. any person doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place; or
- B. any officer of a public body doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place, in which the public body is concerned,

commits an offence.

Offence of giving or accepting gratification by agent

Section 17.

A person commits an offence if-

- (a) being an agent, he corruptly accepts or obtains, or agrees to accept or attempts to obtain, from any person, for himself or for any other person, any gratification as an inducement or a reward for doing or forbearing to do, or for having done or forborne to do, any act in relation to his principal's affairs or business, or for showing or forbearing to show favour or disfavour to any person in relation to his principal's affairs or business; or
- (b) he corruptly gives or agrees to give or offers any gratification to any agent as an inducement or a reward for doing or forbearing to do, or for having done or forborne to do any act in relation to his principal's affairs or business, or for showing or forbearing to show favour or disfavor to any person in relation to his principal's affairs or business.

Offence by commercial organization

Section 17A.

- (1) A commercial organization commits an offence if a person associated with the commercial organization corruptly gives, agrees to give, promises or offers to any person any gratification whether for the benefit of that person or another person with intent –
 - (a) to obtain or retain business for the commercial organization; or
 - (b) to obtain or retain an advantage in the conduct of business for the commercial organization.
- (2) Any commercial organization who commits an offence under this section shall on conviction be liable to a fine of not less than 10 times the sum or value of the gratification which is the subject matter of the offence, where such gratification is capable of being valued or is of pecuniary nature or RM1 million, whichever is the higher, or to imprisonment for a term not exceeding 20 years or to both.

- (3) Where an offence is committed by a commercial organization, a person –
- (a) who is its director, controller, officer or partner; or
 - (b) who is concerned in the management of its affairs,

at the time of the commission of the offence is deemed to have committed that offence unless that person proves that the offence was committed without his consent or connivance and that he exercised due diligence to prevent the commission of the offence as he ought to have exercised, having regard to the nature of his function in that capacity and to the circumstances.

Form A

**ANGLO-EASTERN PLANTATIONS MANAGEMENT SDN BHD / ANGLO-EASTERN
PLANTATIONS (M) SDN BHD / ALL FOR YOU SDN BHD
REPORT ON GIFTS/ADVANTAGES RECEIVED**

Part A – To be completed by Receiving Staff

To : (Approving Authority)

Description of Offeror : _____
 Name & Title : _____
 Company : _____
 Relationship (Business / Personal) : _____

Occasion on which the Gift/Advantage
 was / is to be received : _____

Description & (assessed) value of the
 Gift/Advantage: _____

Suggested Method of Disposal :	Remark
() Retain by the Receiving Staff	
() Retain for Display / as a Souvenir in the Office	
() Share among the Office	
() Reserve as Lucky Draw Prize at Staff Function	
() Donate to a Charitable Organisation	
() Return to Offeror	
() Others (please specify) :	

 (Name of Receiving Staff) (Date)
 (Title / Department)

Date:

Part B – To be completed by Approving Authority

To : (Name of Receiving Staff)

The recommended method of disposal is *approved / not approved. *The gift/advantage concerned should be disposed of by way of :

 (Name of Approving Authority)
 (Title / Department)

Date:

**Delete as appropriate*

Form B**ANGLO-EASTERN PLANTATIONS MANAGEMENT SDN BHD / ANGLO-EASTERN PLANTATIONS (M) SDN BHD / ALL FOR YOU SDN BHD****DECLARATION OF CONFLICT OF INTEREST****Part A – Declaration** (To be completed by declaring staff)

To: _____
 (Approving Authority) via (supervisor of the declaring staff)

I would like to report the following actual/potential* conflict of interest situation arising during the discharge of my official duties:

Persons/companies with whom/which I have official dealings
My relationship with the persons/companies (e.g. relative)
Relationship of the persons/companies with our Company (e.g. supplier)
Brief description of my duties which involved the persons/companies (e.g. handling of tender exercise)

 (Name of declaring staff)
 (Title/Department)

Date:

Part B – Acknowledgement (To be completed by approving authority)

To: _____
 (Declaring staff) via (supervisor of the declaring staff)

Acknowledgement of Declaration

The information contained in your declaration form of (date) is noted. It has been decided that –

- ☐ You should refrain from performing or getting involved in performing the work, as described in Part A, which may give rise to a conflict.
- ☐ You may continue to handle the work as described in Part A, provided that there is no change in the information declared above, and you must uphold the Company's interest without being influenced by your private interest.
- ☐ Others (please specify): _____

 (Name of approving authority)
 (Title/Department)

Date: