



**AMTEL HOLDINGS BERHAD**

**ANTI-BRIBERY AND  
CORRUPTION MANUAL  
("ABC MANUAL")**

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# 1. INTRODUCTION

Amtel Holdings Berhad and its subsidiaries (hereinafter referred to as “Amtel Group” or “the Company”) has adopted a **zero-tolerance policy** against all forms of **bribery and corruption (“Policy”)**. Amtel 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.

This Amtel Group’s Anti-Bribery and Corruption Manual (hereinafter referred to as the “ABC Manual”) elaborate upon those principles, providing guidance to Employees concerning how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise in the course of business. It is also intended to apply to the Board except as otherwise stated in this ABC Manual.

The purpose of this ABC Manual is to: (i) set out our responsibilities to comply with laws against bribery and corruption; and (ii) provide information and guidance to those working for Amtel Group on how to recognize and deal with corruption and bribery issues.

Associated companies in which Amtel Group is a non-controlling co-venturer are encouraged to adopt similar principles and standards.

Amtel Group also expects that suppliers, contractors, subcontractors, consultants, agents, representatives and others performing work or services for or on behalf of Amtel Group will comply with the relevant parts of the ABC Manual when performing such work or services.

This ABC Manual is not intended to provide definitive answers to all questions regarding bribery and corruption. Rather, it is intended to provide employees with a basic introduction to how Amtel Group combats bribery and corruption in furtherance of the group’s commitment to lawful and ethical behavior at all times. Some of the guidelines are designed to prevent situations in which bribery and corrupt practices may take root.

Amtel Group shall establish and maintain an anti-bribery and corruption compliance function under designated personnel with the assumed role of Chief Integrity Officer (“CIO”) for all anti-bribery and corruption compliance matters, including:

- Oversee the design and implementation of ABC Policy and ABC Manual;
- Provide advice and guidance to employees and business associates on implementation of ABC and issues relating to bribery and corruption; and
- Monitor and report the performance of ABC to the Audit Committee on an annual basis.

If you have any doubt about the scope of applicable laws or the application of the group’s policies concerning the fight against bribery and corruption, you should always contact and consult the Human Resources Department (“HR”), or the CIO immediately.

## **“ALWAYS ASK WHENEVER IN DOUBT”**

Engaging in bribery or corrupt practices can have severe consequences for you and to Amtel Group. You may face dismissal, fines and imprisonment, and the company may face damage to reputation, financial loss and disbarment from business and other negative consequences.

An electronic version of this ABC Manual is also available at [www.amtel.com.my](http://www.amtel.com.my)

## 2. APPLICATION AND DEFINITIONS

### 2.1 Application

This ABC Manual is intended to apply to every employee of Amtel Group at all levels or grades. This includes any person who is in the employment of Amtel Group either part time or full time, including but not limited to executives, non-executives, secondees and individuals on direct hire (collectively the “Employees” as defined herein) and the Board (whether full time, part-time, contract or temporary) and any third parties associated with us.

With regard to the “Associated Third Parties” or “Third Parties”, it shall refer to any individual or organization that may come into contact during the course of his or her engagement with Amtel Group, 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”).

If a law conflicts with the policies as set out here, the law prevails and you should comply with the law. If you perceive that a provision in this ABC Manual conflict with the law in your jurisdiction, you should consult with any of the Authorized Personnel, the CIO or Enterprise Risk Management Committee (“ERMC”), rather than disregard this ABC Manual without consultation.

Note that this ABC Manual is applicable to both the Employees and the Board – not only within Malaysia, but also across the world internationally.

### 2.2 Definitions

References to “you” in this ABC Manual refers to any person to whom this ABC Manual applies. Where more specific references are used (such as “Employee”), the more specific reference is intended.

For purposes of this ABC Manual, the term “family” includes the spouse, parent, child (including adopted child and step child), brother, sister and the spouse of child, brother or sister.

Otherwise, some of the other important terms used within this ABC Manual are defined as follow.

“Amtel”	: Amtel Holdings Berhad
“Amtel Group” or “Group”	: Collectively, Amtel Holdings Berhad, its subsidiaries
“Authorized Personnel”	: Personnel appointed to approve or reject Gifts as in Table 2
“Associated Third Parties” or “Third Parties”	: Any individual or organization that an associate may come into contact during the course of his/ her engagement with Amtel and/or Amtel Group, 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
“Benefits”	: Any form of advantages or profits gained by the Board, the Employees, and the Associated Third Parties.
“Board”	: Director (executive and non-executive) of the companies within Amtel Group, except otherwise stated in this ABC Manual.

- “Bribery” : Offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non- financial), directly or indirectly in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to that person’s duties, action or decision.
- “Corporate Hospitality” : Corporate events or activities organized by an organization which involves the entertainment of Employees and third parties for the benefit of that organization.
- “Corruption” : The provision or receipt of monetary or non-monetary bribe or reward of high value for performing in relation to the Board, the Employees’ and the Associated Third Parties’ duties. This includes misuse of a public office or power for private gain or the misuse of private power in relation to business outside the realm of government.
- “Employee” : Any person who is in the employment of Amtel Group either part time or full time, including but not limited to executives, non-executives, secondees and individuals on direct hire.
- “Entertainment” : (a) The provision of recreation; or  
(b) The provision of accommodation or travel in connection with or for the purpose of facilitating entertainment of the kind mentioned in item (a) above, with or without consideration paid whether in cash or in kind, in promoting or in connection with a trade or business activities and/or transactions
- “Facilitation Payments” : Unofficial payment made to secure or expedite the performance by the Board, the Employee(s), and the Associated Third Party(ies) performing a routine or administrative duty or function
- “Gifts” : Any form of monetary or non-monetary such as goods, services, cash or cash equivalents, fees, rewards, facilities, or benefits given to or received by an the Board, the Employees, and the Associated Third Parties, his or her spouses or any other person on his or her behalf, without any or insufficient consideration known to the Board, the Employees, and the Associated Third Parties.
- “Kickbacks” : Any forms of payment intended as compensation for favorable treatment or other improper services. This includes the return of a sum already paid or due as a reward for awarding of furthering business.
- “Money Laundering” : Money laundering occurs when the criminal origin or nature of money or assets is hidden in legitimate business dealings or when legitimate funds are used to support criminal activities, including financing terrorism.

### **3. KEY PRINCIPLES**

We take a zero-tolerance approach towards corruption and bribery. We conduct all of our businesses 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 Conduct and Business Ethics (“COBE”), and to implement and enforce effective system to counter bribery and corruption.

We will uphold all laws relevant to countering bribery and corruption. 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.

Steps taken to uphold ‘zero-tolerance approach towards ‘bribery and corruption’ include:

- a) Implementation of the COBE, ABC Policy and ABC Manual;
- b) Set up of relevant internal control mechanism to prevent and deter any potential bribery and corruption related activities;
- c) Conduct of annual internal audit/ risk assessment and management on bribery and corruption related issues;
- d) Report of the corresponding findings to the Board;
- e) Conduct training programs for all relevant Employees; and
- f) Regular review and continuous improvement on all of the following: COBE, ABC Policy and ABC Manual, at least once every three years

You shall NOT:

- a) Offer, give, or promise to give a bribe or anything which may be viewed as a bribe to secure or award an improper business advantage;
- b) Offer, give, or promise to give a bribe or anything which may be viewed as a bribe to a government official, agent or representative to facilitate, expedite, or reward any action or procedure;
- c) Request or receive a bribe or anything which may be viewed as a bribe from an Associated Third Party knowing or suspecting it is offered with the expectation that it will obtain a business advantage for them; and/ or
- d) Engage in any activity that might lead to a breach of ABC Policy/ ABC Manual.

## **4. GIFT or BENEFITS AND ENTERTAINMENT**

### **4.1 “No Gift” and ‘No Entertainment’ Policy**

Amtel Group has adopted a “No Gift” and ‘No Entertainment’ policy whereby, subject only to certain narrow exceptions, Amtel Group’s Employees, the Board and their family members or agents acting for or on behalf of Amtel Group’s Employees, Board or their family members are prohibited from, directly or indirectly, receiving or providing Gifts, Entertainment and/or Benefits.

In no circumstances may an Employee, Board or their family members accept Gifts or Benefits and Entertainments in the form of cash or cash equivalent.

Amtel Group requires Employees and Directors to abide by this policy to avoid conflict of interest or the appearance of conflict of interest for either party in on-going or potential business dealing between Amtel Group and external parties, as a gift can be seen as a bribe that may tarnish Amtel Group’s reputation or be in violation of anti-bribery and corruption laws.

A conflict of interest arises in a situation in which an individual is in a position to take advantage of his or her role in Amtel Group for his or her personal benefit, including the benefit of his or her family and friends. This would undermine the duties of good faith, fidelity, diligence and integrity as expected by Amtel Group from its Employees and Directors in the performance of their duties and obligations.

It is the responsibility of Employees and the Board to inform external Associated Third Parties involved in any business dealings with Amtel and/ or Amtel Group that the Company practices a “No Gift” and “No Entertainment” policy and to request the external Associated Third Parties’ understanding for and adherence with this policy.

Besides, be aware that the Associated Third Parties dealing with Amtel Group might have also adopted a “No Gift” and ‘No Entertainment’ policy as well.

As a brief guideline, Employees and Directors are expected to exercise proper judgment in handling “Gifts or Benefits and Entertainments” and behave in a manner consistent with the following principles:

- Conscientiously maintain the highest degree of integrity;
- Always exercise proper care and judgment;
- Avoid conflicts of interest;
- Refrain from taking advantage of your position or exercising your authority to further your own personal interest at the expense of Amtel Group; and
- Comply with all applicable laws, regulations, policies and procedures.

### **4.2 Receiving Gifts or Benefits**

The Company is very much aware that the exchange of gifts can be a very delicate matter where, in certain cultures or situations, gift giving is a central part of business etiquette. Despite acknowledging Amtel Group’s “No Gift Policy”, some external parties may still insist in providing gifts to our Employees, Board and/or their family members in certain situations which do not fall within the general exceptions.

Although the general principle is to immediately refuse or return such gifts, accepting a gift on behalf of Amtel Group is allowed only in very limited circumstances, whereby refusing the gift is likely to seriously offend and may severely affect Amtel Group’s business relationship with the Associated Third Party.



In these limited circumstances, Employees are expected to immediately record the gift in the Gift Register provided by the HR Department for submission to Authorized Personnel who will then decide whether to approve the acceptance of the gift or require it to be returned. The Board should inform the Company Secretary or ERMC, as soon as reasonably practicable, to seek advice when faced with a similar situation.

***The best practices is to seek for approval from Authorized Personnel immediately (i.e., at the same working day) upon the receipt of gift. Without approval, the gift is not yours to keep.***

Even if it may appear disrespectful to refuse a gift from an external party, nevertheless, if there is conflict of interest situation (e.g. bidding is in progress and the company that gave the gift is one of the bidders) then clearly the Authorized Personnel cannot approve the acceptance of said gift. In this situation, the gift must be politely returned with a note of explanation about the Company’s “No Gift” policy.

In the event the Authorized Personnel approves the acceptance of the gift, he/ she must also determine the treatment of the gift, i.e., whether to:

- a) Donate the gift to charity; or
- b) Hold it for departmental display; or
- c) Share with other Employees in the department; or
- d) Permit it to be retained by the Employees.

In determining the above, the Authorized Personnel is expected to exercise proper care and judgment in each case, taking into account pertinent circumstances including the character of the gift, its purpose, the position/ seniority of the person(s) providing the gift, the business context, reciprocity, applicable laws and cultural norms.

It is important to understand that the company’s guideline is **not to accept any gift worth more than RM150/individual.**

***Again and as a reminder, IN NO CIRCUMSTANCES may an Employee, Director or his/ her family members accept gifts in the form of cash or cash equivalent.***

The format for the **Gift Register** is shown below.

**Table 1: Gift Register**

<b>Date</b>	<b>Name of Recipient/ Giver</b>	<b>Gift Description</b>	<b>Status (Receiving/ Giving)</b>	<b>Value/ Estimated Value (RM)</b>	<b>Reason for the Gift</b>	<b>Decision (Approved/ Rejected)</b>
						<i>Name, Initials, Date &amp; Treatment (if approved)</i>

The Gift Registers for the different departments are kept by the following Authorized Personnel.

**Table 2: “Authorized Personnel” Selected for Approving/ Rejecting Gift**

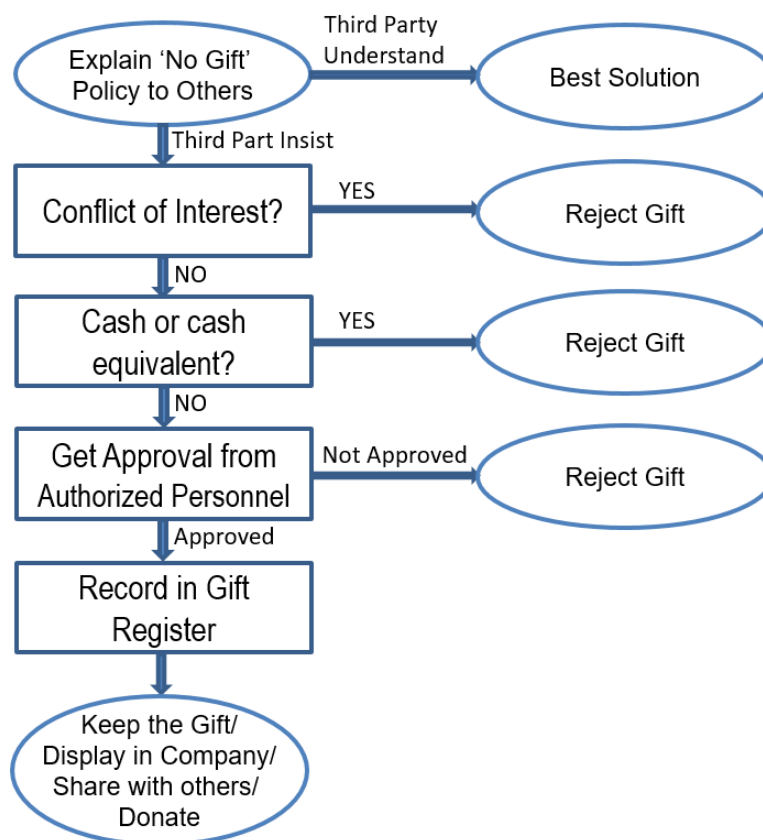
Business Segment/ Department	Names/ Authorized Personnel
Telecommunications, Infrastructure and Services (“TIS”)	Chin Wou Chau
Information and Communication Technology (“ICT”)	Lim Hun Teik (Chief Integrity Officer)
HR/Admin related	Pn. Siti Noor Rossalwana Bt Ali
Accounts/Finance	Wong Shok Fan
Others (e.g., Directors, Third Parties, Consultants)	Koid Siang Loong (Chester)

While the Employees should get the approval (to accept or reject a gift) from the Authorized Personnel, the Authorized Personnel appointed should get their respective approval from their immediate superior or the Group Managing Director. It is expected that these personnel should exercise prudent initiatives in acting as the role model for the Employees, in adhering to the best practices in anti-bribery and corruption.

Remember that the act of “buying lunch, dinner or drinks” for you is also regarded as an act of “gift giving”. You should try to avoid such circumstances if the occurrence can negatively affect the reputation of Amtel or could be perceived by others as corruption or something that can affect your integrity. Key principles when dealing with such issues are:

- Do remind the other parties that Amtel Group is adopting the ‘No Gift’ policy.
- Always reject the treat by others, when the food and/or drink is expected to cost more than RM150/ individual.
- You must at least get the verbal approval from the Authorized Personnel before going for the treat (Remark: do explain to the Authorized Personnel on the nature, context, purpose and details of the lunch, dinner or drinks).
- Do remember to record the treat in the Gift Register.

**Figure 1: Decision Flow Chart for Accepting/ Rejecting Gift**



In conclusion, always beware that there are certain types of gifts which are never permissible and Amtel Group's Employees and Directors should immediately refuse if it involves the following:

- a) Any gift of cash or cash equivalent (i.e., cash equivalent could be in the form of vouchers, discounts, coupons, shares and commission etc.);
- b) Any gifts involving parties engaged in a tender or competitive bidding exercise (i.e., in conflict of interest situation);
- c) Any gifts that come with a direct or indirect suggestion, hint, understanding or implication that in return for the gift, some expected or desirable outcome is required (“quid pro quo”);
- d) Any gift that would be illegal or in breach of local or foreign bribery and corruption laws;
- e) Any gift which is lavish or excessive (e.g. valued above the maximum threshold permitted by the Company); and
- f) Any gift that could adversely affect the reputation of Amtel Group.

### 4.3 Providing Gifts or Benefits

Generally, Employees are also not allowed to provide gifts to Third Parties with the following exceptions:

- a) Exchange of gifts at the company-to-company level (e.g. gifts exchanged between companies as part of an official company visit/ courtesy call and thereafter, the said gift is treated as company property);
- b) Gifts from company to external institutions or individuals in relation to the company's official functions, events and celebrations (e.g. commemorative gifts or door gifts offered to all guests attending the event);
- c) Gifts and/or meals from Amtel Group to Employees and Board and/or their family members in relation to an internal or externally recognized Company function, event and celebration (e.g. annual lunch/ dinner, in recognition of Employee/ Board's service to the Company);
- d) Token gifts of nominal value normally bearing the Amtel or Amtel Group's logo or (e.g. t-shirts, pens, diaries, calendars and other small promotional items) that are given out equally to members of the public, delegates, customers, partners and key stakeholders attending events such as conferences, exhibitions, training, trade shows etc. and deemed as part of the Amtel or Amtel Group's brand building or promotional activities; and
- e) Gifts to external parties who have no business dealings with Amtel Group (e.g. monetary gifts or gifts in-kind to charitable organizations).

As part of the internal control mechanism to combat potential corruption and bribery, only the eligible Officers are allowed to offer gift to Third Party. The list of eligible Officers and the limit allowed for the respective Officers are documented below:

**Table 3: Provision of Gifts – Eligible Officers and the Limit**

Name of Officers	Designation	Maximum Limit
		RM150/ Individual/ month

Provision of gift(s) must also be registered in the Gift Register kept by the respective Authorized Personnel as listed in Table 2. The decision to approve the provision of gift(s) should only be determined by the Group Managing Director.

Do note that the maximum monetary value for gift to be offered to Third Party should not exceed RM150/ individual/ month.

### 4.4 Receiving Entertainment

For explanation purposes, all of the following activities are regarded as Entertainment:

- a) The provision of leisure or recreational activities;

- b) The provision of accommodation services;
- c) The provision of travel services; and/ or
- d) Any other activities provided for the purpose of facilitating entertainment of the kind mentioned above, be it involve monetary expenses or not.

***Note that similar to the 'No Gift' Policy; Amtel Group do in general adopt a 'No Entertainment' Policy as well.***

Nonetheless, Amtel Group recognizes that the occasional acceptance of a reasonable and modest level of entertainment provided by Third Parties in the normal course of business is a legitimate way to network and build good business relationships.

However, you are required to obtain approval prior to receiving entertainment from Third Parties.

The Authorized Personnel is expected to be able to reasonably estimate the monetary value of the entertainment to be received. The estimated value of the entertainment received should never exceed RM150/ individual/ month.

In no event, however, shall you or any of your family members accept entertainment in exchange for an exercise or non-exercise of your authority or otherwise to the detriment of Amtel Group.

These are certain types of entertainment activities which are never permissible and you should immediately refuse if it involves the following:

- Any entertainment that comes with a direct/ indirect suggestion, hint, understanding or implication that in return for the entertainment provided some expected or desirable outcome is required (“quid pro quo”);
- Any entertainment activities that would be illegal or in breach of local or foreign bribery laws;
- Any entertainment activities that would be perceived as extravagant, lavish or excessive or may adversely affect the reputation of Amtel Group; and
- Any entertainment activity that is sexually oriented or may otherwise tarnish the reputation of Amtel Group.

Last but not least, do be aware that you should also record any entertainment received or provided in the Gift Register as well.

All of the above policies are not only to safeguard the Company’s reputation, but also to protect employees and directors from allegations of impropriety or undue influence.

## **4.5 Providing Entertainment**

In terms of provision of entertainment to Third Party, do be aware that Amtel Group had adopted a ‘No Entertainment’ Policy as well.

Nonetheless, Amtel Group recognizes that providing modest entertainment is a legitimate way of building business relationships and to foster good business relationship with external clients. As such, eligible Employees are allowed to entertain external clients through a reasonable act of hospitality as part of business networking process.

The list of eligible Employees and the budgeted expenses allowed for the respective Employees are documented below.

**Table 4: Provision of Entertainment – Eligible Officers and the Limit**

<b>Name of Officers</b>	<b>Designation</b>	<b>Maximum Limit</b>
Name: Designation		RM150/ Individual/ month

Do understand that the provision of entertainment by Amtel Group should always be documented in the relevant Gift Register kept by the respective Authorized Personnel as listed in Table 2.

Note that any entertainment activities that would involve public officials shall require the prior approval of the CIO. It is crucial to have solid reasons that the entertainment activities which will involve public officials are ethical and free from conflict of interests.

Importantly, do be aware that provision of entertainment should never be permissible if such act may eventually create a negative perception towards Amtel Group. Employees and directors should always bear in mind that this is an area where perception is often regarded as more important than facts and therefore you should always exercise proper care and judgment when providing entertainment to Third Parties especially when it involves public officials to ensure compliance with local anti-bribery and corruption laws.

#### **4.6 Summary**

You are dehorted from accepting or receiving Gifts or Benefits and Entertainment from Third Party(ies) or stakeholder(s) of external Companies that might create a sense of obligation and compromise their professional judgement or create appearance of doing so.

You shall exercise proper care and judgement in respect of giving or receiving any Gifts or Benefits and Entertainment on a case-to-case basis.

The occasional giving or receiving of Gifts or Benefits and Entertainment is justifiable. However, the frequent giving or receiving of Gifts or Benefits and Entertainment (i.e., even within the permissible monetary amount) will be considered as breaching of the ABC Policy. Note that the frequency of giving or receiving of Gifts or Benefits and Entertainment of more than 1 time per quarter will be considered as “frequent” and therefore inappropriate.

You shall take into consideration the impact of your actions with regards to how your actions will be perceived (i.e., influencing their decision) and the impact towards the business operations of the Company prior to giving or accepting any Gifts or Benefits and Entertainment.

We encourage the use of good judgement when giving or accepting the Gifts or Benefits and Entertainment. All the Gifts or Benefits and Entertainment must be:

- a) Reasonable in value;
- b) Infrequent in nature;
- c) Transparent and open;
- d) Not given to influence or obtain an unfair advantage; and
- e) Respectful and customary.

## 5. CORPORATE HOSPITALITY

### 5.1 Introduction to Corporate Hospitality

Corporate hospitality is broadly defined as “corporate events or activities organized by an organization which involves the entertainment of employees and Third Parties for the benefit of that organization”.

Corporate hospitality is recognized as a legitimate way to network and build goodwill in business relationships. However, there is a fine line between what is considered to be legitimate versus illegitimate forms of corporate hospitality. The question is whether there is any intention to influence or be perceived to influence the improper outcome of a business decision by providing the corporate hospitality.

Corporate hospitality would be illegitimate in the following situations:

- a) If it provides an advantage to another person if offered; or
- b) If it is given with the intention of inducing the person to perform a relevant function improperly; or
- c) If there is knowledge that acceptance of the advantage would in itself be improper performance.

Transparency International (<https://www.transparency.org/en/>) has advocated that corporate hospitality arrangements or activities should conform to the following basic principles:

- *TRANSPARENCY*, in that all corporate hospitality is reported and written approval is obtained, all records of which are properly kept;
- *PROPORTIONALITY*, i.e., the corporate hospitality must not be too excessive. In addition, the corporate hospitality must commensurate with the recipient’s official capacity and not provided in his/ her personal capacity;
- *REASONABLENESS* in ensuring that the corporate hospitality is not lavish; and
- *BONA FIDE*, where the intention to offer and/ or provide the corporate hospitality is done with good and legal intentions.

### 5.2 Receiving Corporate Hospitality

As a general principle, Amtel Group strictly prohibits Employees and Board from soliciting corporate hospitality nor are they allowed to accept hospitality that is excessive, inappropriate, illegal or given in response to, in anticipation of, or to influence a favorable business decision, particularly from parties engaged in a tender or competitive bidding exercise (for example: contractors, vendors, suppliers etc.).

Notwithstanding the above, Amtel Group recognizes that the occasional acceptance of an appropriate level of hospitality given in the normal course of business is usually a legitimate contribution to building good business relationships. However, it is important for Employees and Board to exercise proper care and judgment before accepting the hospitality. This is not only to safeguard the Company’s reputation, but also to protect Employees and Board from allegations of impropriety or undue influence.

It is crucial for the Employees and Directors to access the ‘estimated costs’ per person prior to attending any corporate hospitality events or activities. It is crucial to avoid attending to any corporate hospitality events or activities which is overly luxurious or lavish, especially when such events are catering to only a small crowd of individuals (i.e., below 10 people).

If you have any doubts on the appropriateness of a corporate hospitality offered by an external party for example, a contractor or supplier, you should either decline the offer or consult the Authorized Personnel. In the case of the Board, you should seek the advice of your Company Secretary or ERM.

In short, these are the types of corporate hospitality activities which are NEVER permissible and you should immediately refuse if it involves the following:

- a) Corporate hospitality offered by Third Parties currently engaged in the tender or competitive bidding exercises for Amtel Group's business or project;
- b) Corporate hospitality offered that comes with a direct/ indirect suggestion, hint, understanding or implication that in return for the corporate hospitality provided some expected or desirable outcome is required ("quid pro quo");
- c) Any corporate hospitality activities that would be illegal or in breach of local or foreign bribery laws;
- d) Corporate hospitality which is lavish or excessive or may adversely affect the reputation of Amtel Group; and
- e) Any corporate hospitality activities that are sexually oriented or may otherwise tarnish the reputation of Amtel Group.

Note that any Employees or Directors receiving corporate hospitality should also register it in the Gift Register.

### **5.3 Providing Corporate Hospitality**

Amtel recognizes that providing corporate hospitality to its stakeholders be it through corporate events, sporting events or other public events, is a legitimate way to network and build goodwill in business relationships.

While providing corporate hospitality is a reflection of Amtel's courtesy and goodwill, the respective Authorized Personnel must exercise proper care to protect the Company's reputation against any allegations of impropriety or the perception of bribery especially when the arrangements could influence or be perceived to influence the outcome of a business decision and are not reasonable and bona fide expenditures.

There should also be explicit, clear and internally transparent criteria to determine the selection of guests to be invited to any Amtel Group's corporate hospitality event. The management must treat all of the guests reasonably fairly and equally, as to prevent Amtel Group from being perceived as giving preferential treatments to certain individuals.

Reasonable due diligence should be exercised, particularly when the arrangements involve public officials. The invitation of public official is only permissible upon the approval by the CIO.

The following are some of the recurring examples of Amtel Group providing corporate hospitality:

- a) Annual dinner celebration
- b) Hari Raya and Chinese New Year celebration
- c) Annual General Meeting (AGM) for public investors

The budget on provisioning of corporate hospitality should never exceed RM150/ individual. The provisioning of any corporate hospitality events or activities is only permissible upon the approval by the CIO. Besides, all expenses incurred to provide the corporate hospitality must be properly documented, receipted and recorded. Last but not least, key person organizing the corporate hospitality event should also record the particular event in the Gift Register.

## 6. DEALING WITH PUBLIC OFFICIALS

### 6.1 Dealing with Public Officials

A 'Public/ Government Official' is defined as: "candidates for public office, officials of any political party, and officials of state-owned enterprises".

Caution must be exercised when dealing with Public Official as the laws of bribery and corruption in some countries are more stringent and provides for stricter punishments.

***Providing Gift, Benefits, Entertainment or Corporate Hospitality to Public Official or their family members is generally considered a 'RED FLAG' situation in most jurisdictions.***

Do not act on your own accord when providing Gift, Benefits, Entertainment or Corporate Hospitality to public officials.

Do not approve any requests by the public official to transfer the gift or entertainment to his family members or friends that are not authorized to accept the gift or entertainment. Doing so might be perceived as bribery even with the least strict of laws or policies. Kindly advise the public official that "transfer" of gifts or entertainment is against Amtel's ABC Policy.

You are prohibited from paying for non-business or business-related travel and hospitality for any Public Official or his/ her family members without permission from CIO.

If approval is obtained for you to provide Gift, Benefits, Entertainment or Corporate Hospitality to Public Official, you must ensure that the Gift, Benefits, Entertainment or Corporate Hospitality is not excessive and lavish, and that it will not cause any impression that the provision of such Gift, Benefits, Entertainment or Corporate Hospitality is associated with bribery or corruption.

You must also be aware of local laws governing the activity and to ensure compliance. You should seek guidance from the CIO in case you have any doubt on this matter.

In short, do ensure that proper care and judgment is exercised to confirm that there is no conflict of interest when dealing with any Public Official.

Last but not least, NEVER ever attempt to conceal, alter, destroy or otherwise modify any documentation that relates to Gift, Benefits, Entertainment or Corporate Hospitality accorded to Public Officials.

### 6.2 Employees as Public Officials

It is well acknowledged that Amtel Group might have recruited or engaged certain Public Official as the Employees legally.

Under such circumstances, you should always abide by Amtel's ABC Policy and guidelines in relation to Gift, Benefits, Entertainment or Corporate Hospitality (example: the "No Gift" Policy).

If you have any queries on this matter, you should always consult and seek further advice from the CIO.



## 7. CORPORATE SOCIAL RESPONSIBILITY (CSR)

Within this ABC Policy, Corporate Social Responsibility (CSR) is defined as those “philanthropic and/or charitable initiatives organised by Amtel Group for the betterment of the society and natural; environment”. Such initiatives are to be spearheaded and/or monitored by the senior management within the Amtel Group. There are no direct financial/monetary contributions towards the recipient of the CSR initiative.

The initiatives which involve direct financial/monetary contributions to any Third Party will be regarded as Sponsorship and Donation (Refer to the next section).

As a responsible corporate citizen, Amtel is committed to contributing to the well-being of the people and natural environment in countries where it operates. It is however important that all Corporate Social Responsibility (CSR) are made in accordance with Amtel’s policies.

Take note that all of the CSR initiatives must firstly receive approval by the Group Managing Director/CIO, prior to its implementation process.

CSR efforts made by Amtel or Amtel Group to community projects or charities need to be made in good faith and in compliance with Amtel’s Code of Conduct and Business Ethics (COBE), ABC Policy, ABC Manual and all other relevant Amtel’s policies and procedures.

Any key officer appointed in handling the CSR activities for Amtel Group must perform the relevant due diligence in ascertaining the eligibility, appropriateness, and legality of the recipients of the CSR initiatives to be conducted by Amtel Group.

Under NO circumstances that Amtel Group can make CSR contributions to any CSR recipient, which identity or status is questionable, or could lead people to perceive that CSR initiative as bribery or corruption related (example: leveraging on CSR initiatives to gain business advantages).

In the case that Amtel is asked by governments to contribute to CSR activities in the countries where the company has operations; Amtel Group can provide such assistance in appropriate circumstances and in an appropriate manner. However, such requests must be carefully examined for legitimacy and not be made to improperly influence a business outcome. All of such requests must be approved by the Group Managing Director/CIO before implementation.

CSR activities is one of the topics of interest for engagement with the local community under Amtel’s sustainability initiatives. The following are recorded and disclosed in the Sustainability Statement of Amtel’s Annual Report, when it comes to the implementation of CSR activities by Amtel Group:

- a) Beneficiaries of the CSR initiatives
- b) Total expense associated with the CSR initiatives
- c) Rationale for the CSR initiatives

## 8. SPONSORSHIPS & DONATIONS

### 8.1 Guidelines on Donation or Sponsorship for CSR Purposes

Take note that Sponsorships and Donations can be sensitive matters as it involved direct monetary or financial contributions or assistance to the targeted recipient. The decision making and implementation process – when it comes to Sponsorships and Donations – must be conducted with adherence to the following values:

- a) Integrity
- b) Transparency
- c) Prudent
- d) Value adding to the society and natural environment

Generally speaking, all Sponsorships and Donations must comply with the following:

- a) Permitted or allowed by applicable laws;
- b) Had already obtained all the necessary approval from the relevant authorities (if necessary);
- c) Had already conducted the proper due diligence on the context, nature, and recipient of the Sponsorships and Donations;
- d) Had already obtained the approval from the Group Managing Director/CIO;
- e) Being accurately recorded and documented in the company's accounting books; and
- f) Being disclosed in Annual Report.

In the case that Amtel Group is contributing financial assistance to another entity for CSR purposes, it is crucial for the CIO to conduct proper due diligence as to ensure that the recipient is actually valid, relevant and well established entity, which has the necessary skills, capabilities and adequate governance structure to guarantee proper administration of the funds.

Employees and Directors must NEVER make any Sponsorships and Donations as the following nature:

- a) To circumvent or avoid any of the provisions and guidelines outlined within the ABC Manual, ABC policy and COBE;
- b) As the subterfuge for bribery and corruption (example: cover up of illegal payments to any person or entity); and
- c) The conduit to fund illegal activities in violation of international anti-money laundering, anti-terrorism and other applicable laws.

In fact, any Donation or Sponsorship which may be perceived to breach applicable law or any other guidelines mentioned within the ABC Manual or ABC Policy should be avoided. In line with this, look out for the following RED FLAG:

- a) The designated recipient or entity has affiliations with a Public Official or their relatives;
- b) The contribution is made on behalf of a Public Official;
- c) There is a risk of a perceived improper advantage for Amtel Group;
- d) The designated recipient is based in a high-risk country; and/ or
- e) The activity takes place in a high-risk country.

Do not conceal, alter, destroy or otherwise modify any relevant information, which in the normal course of business, may raise potential red flags that would require additional investigation, prior to any Donation or Sponsorship.

## 9. POLITICAL CONTRIBUTIONS

Amtel Group's property(ies), facility(ies), service(s) or employee(s) time cannot be used for or contributed to any political party(ies) or candidate(s) for public office without approval by the Group Managing Director.

Amtel Group DOES NOT make charitable donations or contributions to political parties; whilst the Employees and the associated Third Parties acting in their personal capacity as citizens are not restricted to make any *personal* political donations.

In other words, Amtel Group encourages employees to participate in the political election process by voting. Employees may choose to make personal political contributions as appropriate within the limits established by law.

However, take note that Amtel Group will not make any reimbursement for these personal political contributions back to its Employees or the Associated Third Parties.

In short, it is your responsibility to be aware and educate yourself with all applicable laws and regulations in your jurisdiction that may prohibit or restrict companies from getting involved in political activities, make political contributions or engage in lobbying activities.

Make clear that your political views are your own when engaging in personal political activity and it does not reflect the views of Amtel Group.

Otherwise, Employees and/or Directors are prohibited from acting on the below:

- a) Using their position within Amtel Group to try to influence any other person (whether or not employed by Amtel Group) to make political contributions or to support politicians or their parties in any country;
- b) Make any contribution or incur any expenditure using Amtel Group's resources to benefit any political campaign, party or politician in any country;
- c) Use of Amtel Group's facilities, equipment and resources for any political campaign or party functions; and/or
- d) The use of charitable donations as a subterfuge for prohibited political payments.

Employee engaging in their personal political activity and caused harm to Amtel Group will result in disciplinary action, including dismissal or other punitive action in accordance with local law.

## 10. FACILITATION PAYMENT

### 10.1 Guidelines on Facilitation Payments

“Facilitation payment” is defined as ‘payments made to secure or expedite the performance by a person performing a routine or administrative duty or function’. Facilitation payments need not involve cash or other financial asset; it can be any sort of advantage with the intention to influence them in their duties.

Facilitation payment is also seen as a form of bribery and corruption.

Amtel Group prohibits accepting or obtaining, either directly or indirectly, Facilitation Payments, or Kickbacks of any kind from any person for the benefit of the employee himself or for any other person.

All persons must not offer, promise, give, request, accept or receive anything which might reasonably be regarded as a facilitation payment. If you receive a request or if you are offered facilitation payments, you must report it to any of the Authorized Personnel.

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. Further details of the Whistleblowing Policy are as disclosed in:

- a) Section 17.0 of this ABC Manual
- b) The company website at [www.amtel.com.my](http://www.amtel.com.my)

However, there are certain situations or circumstances where you are faced with having to make facilitation payments in order to protect your life, limb or liberty. In dangerous situations like this, you are allowed to make payments but you must immediately report to any of the Authorized Personnel or ERMC. Making facilitation payment in such a situation is the only exception which can be used as a defense when faced with allegations of bribery and corruption.

## 11. MONEY LAUNDERING

Money laundering occurs when the criminal origin or nature of money or assets is hidden in legitimate business dealings or when legitimate funds are used to support criminal activities, including financing terrorism.

Amtel Group strongly objects to practices related to money laundering, including dealing in the proceeds of criminal activities.

Money laundering is a very serious crime and the laws governing this type of crime can have extra territorial effect, i.e. the application of the law is extended beyond local borders. The penalties for breaching anti-money laundering legislation are severe and can include extradition and incarceration in foreign jurisdictions.

To avoid violating anti-money laundering laws, Employees are expected to always conduct counterparty due diligence to understand the business and background of Amtel Group's prospective business counterparties.

Counterparty means any party that Amtel Group is currently in relationship with or intends to do business with in the future, either on a regular or one-off basis. Counterparties include but are not limited to customers, contractors, suppliers, consultants, agents, Joint Venture partners and any other business partners.

Managerial executives should be aware and understand that a number of initiatives can be taken to strengthen anti-money laundering governance, including the following:

- a) Adequate training and compliance programs should be conducted to ensure understanding and strict compliance to any internal anti-money laundering policies.
- b) Employees frequently involved in decision making process concerning counterparties particularly in matters on financial transactions should be properly acquainted with the applicable laws and regulations related to money laundering.
- c) Employees should be attentive to and report suspicious behavior by customers, consultants and business partners using proper reporting channels, in-house experts on anti-money laundering should always be consulted.
- d) Convoluted payment arrangements such as payment in cash, payment to a Third Party or to accounts in other countries or requests for upfront payment for expenses or other fees.
- e) Periodic audits should be conducted and a process should be developed to follow all available accounting, record-keeping and financial reporting requirements applicable to cash and payments in connection with other transactions and contracts.

## 12. DEALING WITH THIRD PARTIES

### 12.1 Dealing with Third Parties

Amtel expects that all Third Parties acting for or on its behalf to share the Company's values and ethical standards as their actions can implicate Amtel legally and tarnish the Company's reputation. Therefore, where we engage Third parties, such as contractors, agents, intermediaries or joint venture partners, we are obligated to conduct appropriate counterparty due diligence to understand the business and background of Amtel Group's prospective business counterparties before entering into any arrangements with them to ensure that we are dealing with counterparties that subscribe to acceptable standard of integrity in the conduct of their business.

Appropriate assessment shall be conducted to Third Parties to ensure the business and background of these Third Parties are free from bribery elements or conflict of interest prior to business dealings with them.

To help ensure that we only do business with Third Parties that share Amtel's standards of integrity, we must do the following:

- Conduct due diligence to assess the integrity of Amtel Group's prospective business counterparties. Do not enter into any business dealings with any Third Party reasonably suspected of engaging in bribery and improper business practices unless those suspicions are investigated and resolved.
- All Third Parties are made aware of the Amtel's Code of Conduct and Business Ethics (COBE), ABC Manual and ABC Policy and our expectations of them.
- Continue to be aware of and to periodically monitor Third Party performance and business practices to ensure ongoing compliance.

Amtel Group requires its employees to use good judgment and common sense in assessing the integrity and ethical business practices of Third Parties and have provided the above as a guideline.

The discovery of any conflicts of interest or "red flags", at any point during the due diligence exercise or in the midst of dealing with a Third Party, will demand the corresponding officer to carry out further investigation in order to address possible unethical or illegal issues.

Examples of common "red flags" involving Third Parties include:

- a) The transaction involves a country known for a high incidence of corrupt payments.
- b) Family, business or other "special" ties with government or Public Officials.
- c) A reference check on the Third Party reveals a flawed background or a reputation for getting "things done" (example: ability to fix a problem provided with a certain amount of money).
- d) Objection to anti-bribery representations and warranties in commercial agreements or negative response when told of such requirements.
- e) Convoluted payment arrangements, such as: (i) payment in cash, (ii) payment to a Third Party or to accounts in other countries or (iii) requests for upfront payment for expenses or other fees.
- f) The Third Party requires that his/ her identity not be disclosed as part of the business transaction.
- g) Inadequate credentials for the nature of the engagement or lack of an office or an established place of business.

Approval from CIO must be obtained prior to further dealings with any Third Party in case of discovery of "red flags" situation mentioned above.

If it is not possible to resolve the 'red flags' mentioned above; the Third Party must be:

- a) Barred from being on the list of registered or licensed contractors/ suppliers; and/ or
- b) Disqualified from participating in any tender exercise by Amtel Group

## **12.2 Dealing with Contractors and Suppliers**

Amtel Group is committed to uphold the highest standard of ethics and integrity in all aspects of its procurement activities. The information in this section is of particularly important for anyone involving in the procurement function for Amtel Group.

Contractors or Suppliers selection should never be based on receipt of the Gifts, Entertainment or Benefits. Bidding process is open to all qualified bidders and no parties having the unfair advantage of separate, prior, close-door negotiations for a contract.

You should avoid dealing with any Contractors or Suppliers known or reasonably suspected of corrupt practices or known or reasonably suspected to pay bribes.

Amtel Group's managerial executives dealing with Contractors or Suppliers must conduct due diligence on prospective Contractors or Suppliers to confirm whether or not they have in place anti-bribery and corruption programmes and that they will not engage in any improper practices.

The managerial executives dealing with Contractors or Suppliers must ensure that all procurement activities are in line with the relevant procurement policies and procedures (within the jurisdiction of which the business is conducted). These include (but not limited to):

- Conduct of due diligence and risk assessment on Contractors or Suppliers are performed before dealing with them;
- Preparation and maintenance of appropriate written documentation of the due diligence and risk assessment performed;
- Contractors and Suppliers are made aware of and understand the Amtel's COBE and that they will comply accordingly;
- All commercial contracts and invitations-to-bid (ITBs) should incorporate the relevant provisions relating to ethical business conduct, conflict of interest as well as anti-bribery and corruption; and
- Amtel Group retains the right to audit the Contractors or Suppliers if they are in compliance with the COBE, ABC Policy and ABC Manual.

In Malaysia, it is necessary to ensure that the 'General Terms and Conditions of License' for Contractors or Suppliers do incorporate the provisions relating to ethical business conduct, conflict of interest as well as anti-bribery and corruption.

Amtel Group's managerial executives dealing with Contractors or Suppliers should also monitor significant contractors and suppliers as part of the regular review of their performance. Amtel Group has the right to terminate their services in the event that the contractors and suppliers had violated the anti-bribery and corruption laws or act in a manner which is inconsistent with the COBE, ABC Policy and ABC Manual.

## **12.3 Dealing with Joint Venture Partners**

In view of the possibility that Amtel Group may be held responsible for the illegal activities of its co-venturers, it is crucial to ensure that Joint Venture ("JV") in which Amtel Group has a controlling interest do also adopt the best practices, principles and guidelines outlined in this ABC Manual.

Where Amtel Group neither controls nor operates the JV or where Amtel Group holds a minority interest, it is still crucial to:

- Make reasonable efforts to influence the JV to adopt the best practices, principles and guidelines outlined in this ABC Manual.

- Be alert to 'red flags' which may arise during the course of the conduct of the business together with the JV. Any such 'red flags' must be reported to the CIO so that relevant action can be taken.
- Request, and if possible, require that the JV to provide written document on compliance with anti-bribery and corruption related legislation, on an annual basis.



## 13. RESPONSIBILITIES

The Board has oversight of this Policy. The Group Managing Director, SBU Heads/General Managers and HOD are responsible for ensuring the compliance with the ABC Policy and ABC Manual. Every employee is required to be familiar with and comply with this ABC Manual.

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

Any individual and/or 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 as outlined in our Whistleblowing Policy.

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 the ABC Policy, ABC Manual and/or any other anti-bribery and corruption laws.

Punishment for violating the law are against him/her as an individual and may include imprisonment, probation, mandated community service and monetary fines and others which will not be paid by Amtel and/or Amtel Group.

Any person who knows and fails to report **an act of giving and offering of bribes** is committing an offence under Section 25 (1) and (2) of the MACC Act 2009:

- FINE: not exceeding one hundred thousand ringgit; and/ or
- IMPRISONMENT: Not exceeding 10 years; and/ or
- BOTH.

Any person who knows and fails to report **an act of soliciting and obtaining of bribes** is committing an offence under Section 25 (3) and (4) of the MACC Act 2009:

- FINE: not exceeding ten thousand ringgit; and/ or
- IMPRISONMENT: Not exceeding 2 years; and/ or
- BOTH.

## **14. RECORD KEEPING**

We must keep all financial and operations 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, any Third Parties.

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.

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 business transactions should be kept "off-book" to facilitate or conceal improper payments.

## **15. COMMUNICATION & TRAINING**

Amtel Group 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.

Amtel's 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.

## **16. MONITORING & REVIEW**

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

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.

## **17. WHISTLEBLOWING POLICY**

Amtel encourages openness and transparency in its commitment to the highest standard of integrity and accountability.

If you make a report or disclosure about any actual or perceived bribery or corruption in good faith, belief, without malicious intent, that a breach or violation as aforesaid may have occurred or may about to occur, you will be accorded protection of confidentiality, to the extent reasonably practicable, notwithstanding that, after investigation, it is shown that you were mistaken. In addition, Employees

who whistleblow internally will be protected against detrimental action for having made the disclosure, to the extent reasonably practicable.

Any alleged or suspected improper conduct must be disclosed using the procedures provided for in the Amtel Whistleblowing Policy as adopted. The detailed procedures on whistleblowing is available at the Company's corporate website at <http://www.amtel.com.my>.

## **18. CONFIDENTIALITY & PROTECTION**

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.

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 unfavorable treatment connected with raising a concern.

## **19. CONTINUOUS IMPROVEMENT**

Amtel Group is committed to continually improving its policies and procedures relating to anti-bribery and anti-corruption. Group Compliance and Integrity may therefore endeavour to develop further integrity measures and certify the Group's anti-bribery procedures as adequate where certification is available.

## **20. SANCTIONS FOR NON-COMPLIANCE**

Amtel Group regards bribery and corruption as a serious matter. Non-compliance may lead to disciplinary action, up to and including termination of employment. Further legal action may also be taken in the event that the Group's interests have been harmed as a result of non-compliance.

The Group shall notify the relevant regulatory authority if any identified bribery or corruption incidents have been proven beyond reasonable doubt.

Where notification to the relevant regulatory authorities have been done, the Group shall provide full co-operation to the said regulatory authorities, including further action that such regulatory authority may decide to take against convicted Employees.

## **21. WAIVER**

Any deviation or waiver from this Policy must be recommended by ERM and to be approved by the Audit Committee and the Board.

## 22. SUMMARY

Checklist when it comes to making prudent anti-corruption decision.

- **Best Practice** – NEVER GIVE OR ACCEPT ANY GIFT, BENEFITS OR ENTERTAINMENT.
- **Intention** – Intention to influence someone for unfair advantage is WRONG.
- **Perception** – WRONG if the act of accepting or giving will give anyone the impression that this is unfair, unethical, not professional, or illegal.
- **Value** – WRONG if something is lavish, excessive or outside business practice.
- **Cash** – WRONG if the ‘gift’ is actually cash or cash equivalent.
- **Conflict of Interests** – AVOID giving or receiving in case of potential conflicts of interests.
- **Questionable Parties** – AVOID to deal with Third Parties whom are questionable.
- **Approval** – WRONG if yet to obtain approval from the superior.
- **Illegal** – WRONG if it is illegal within the jurisdiction of which the business is conducted.
- **Record** – WRONG if it is not recorded accurately, or there are efforts of trying to conceal information.
- **Sexual** – WRONG for anything that sexually oriented or may otherwise tarnish the reputation of Amtel Group.
- **Public Official** – Exercise CARE and PRUDENCE.

## 23. FURTHER CLARIFICATIONS

Should you require further clarification with regards to this ABC Policy/ ABC Manual, you should consult:

- a) Chief Integrity Officer (CIO);
- b) Authorized Personnel;
- c) Human Resource (HR) Department;
- d) SBU Heads/General Managers and/or Head of Department (HOD); or
- e) Members of the Enterprise Risk Management Committee (ERMC)

***AMTEL RESERVES THE RIGHT TO AMEND THIS POLICY AND GUIDELINES.***

- End of Document -