



MATANG BERHAD

Registration No: 201501017043 (1142377-X)
(Incorporated in Malaysia)

ANTI-BRIBERY AND CORRUPTION POLICY

1. INTRODUCTION

Matang Berhad ("Matang" or "Company") has established and adopted a zero-tolerance policy towards all forms of bribery and corruption ("Policy"). The Company is committed to conducting business ethically, transparently and strives to comply with all applicable bribery and corruption laws and regulations, including the Malaysian Anti-Corruption Commission Act 2009 and the Penal Code Malaysia. This Policy shall be read together with Matang's other policies, procedures, and guidelines.

2. SCOPE

This Policy applies to all business entities under Matang ("Matang Group"), their employees and contracted parties. This includes Directors (executive and non-executive), employees (full time, part-time or contracted) and the Company's business associates including service providers, suppliers and customers. Where in this Policy references are made to Company, it shall also be read as applicable to all companies within Matang Group.

3. DEFINITIONS

- a. "Bribery"
The act of promising, offering or giving an advantage in the form of monetary or non-monetary return, as an incentive for a person in a place of power to act or refrain from performing his/ her duties in the benefit of the offeror.
- b. "Corruption"
The abuse of position or power for personal gain by granting or receiving undue actions, favours or advantages.
- c. "Gift"
Any form of monetary or non-monetary offering, including but not limited to, cash money, redeemable vouchers, travelling arrangement, entertainment expenses, and any other item/ service of high or material value that is given to or received by the Company's Board of Directors, employees, or business associates.
- d. "Facilitation Payment"
Unofficial and improper transfers of value offered or made to secure or expedite a routine or necessary action to which one is otherwise legally entitled.
- e. "Business Associates"
A person(s) or organisation(s) that provides services or materials to the Company, including suppliers, distributors, agents, advisors, consultants, subcontractors, and joint venture partners.

4. GIFT

- a. In general, Directors and employees within Matang Group are not to give or receive gift, to or from third parties, to directly or indirectly gain undue advantages such as obtaining or retaining business, favours and benefits. However, the Company recognises the exchange of gift may be customary in maintaining goodwill and reinforcement of business relationships.
- b. The Company encourages the use of good judgment and due diligence when giving or receiving gift. All gifts, including entertainment, administered or received shall be reasonable, appropriate and not violating any existing laws and regulations. Gift is deemed reasonable should they comply to the following:
 - i. Not material or significant in value;
 - ii. Transparent and accountable;
 - iii. Not given as to solicit an unfair/ undue advantage;
 - iv. Not given to be placed in a position of conflict to the Company's interests; and
 - v. Does not contravene with the laws.

5. FACILITATION PAYMENT

All Company's Directors and employees are strictly prohibited from offering, giving, soliciting, requesting, accepting, and receiving any form of undue advantage which can be deemed as facilitation payment. If a Director or an employee does receive a request for, or offer, facilitation payment, he or she must raise the incident to an immediate supervisor or the Chairman of Matang's Audit and Risk Management Committee through the appropriate procedures as outlined in Matang's Policy on Whistle-Blowing.

6. POLITICAL DONATION

- a. Matang does not endorse any donation or contribution to political parties. The Company's Directors and employees are not restricted to making donation but are only to do so in their personal capacity. The donation is not eligible for reimbursement by the Company.
- b. No donation or contribution should be made in a manner which is in violation of existing laws and regulations. If an employee is found to be in violation, disciplinary action up to termination of employment may be enforced.

7. CHARITABLE DONATION

- a. Matang allows charitable donation, including sponsorships, that is made in good faith and complies with the existing laws and regulations. Donations made must not be used to cover up an immoral or undue payment.
- b. All charitable donation can only be made with the approval of the Company's Management Committee or the Board of Directors. Personal donation without approval will not be eligible for reimbursement.

8. RECORD KEEPING

- a. The Company is to keep financial records in the forms of invoices, receipts and supporting documents for any payments made to business associates, and other third parties. The Company does not tolerate “off-book” accounts being used to conceal payments deemed illegal or improper by laws and regulations.
- b. All Directors and employees are to submit the related documentations of gift transactions, and to provide reason thereof, for giving or receiving these gifts which could potentially be construed as bribery.

9. NON-COMPLIANCE

- a. Matang shall conduct periodic audits to ensure the compliance with this Policy. These exercises may be conducted through the Company’s internal audit or separately contracted externally to independent consultants.
- b. In accordance with the Company’s zero-tolerance stance against all forms of bribery and corruption, non-compliance with this Policy may result in disciplinary actions to be taken against the offending Director(s) or employee(s). The Company shall also enforce a termination of contract with its business associates including service providers and suppliers, should they have been proved to be involved in bribery and corruption activities. Further legal action against offending parties may occur if the Company’s reputation and interest has been harmed as a result of the violation of this Policy.
- c. Matang encourages any individual with suspicions on bribery and corruption to raise a report in accordance to the procedures prescribed in the Matang’s Policy on Whistle-Blowing.