



L&P Global Berhad

(Formerly known as Berjayapak International Holdings Sdn. Bhd.)
Registration No. 202101028085 (1428385-M)
(Incorporated in Malaysia)

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY



Revision History

Version	Description	Prepared by:	Reviewed by:	Approved by:	Effective Date
000	Approval of Policy	Ow CK	Executive Directors	Board of Directors	27/04/22

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. INTRODUCTION

- 1.1 The Board of Directors (the “Board”) of L&P Global Berhad (“**L&P** ” or “**the Company**”) and its group of subsidiaries (“**the Group**”) is committed to conduct business with honesty, integrity and ethics in all business dealings and all jurisdictions in which the Group operates in.
- 1.2 This commitment is embodied in the L&P ’s Code of Conduct & Ethics Policy and this Anti-Bribery and Anti-Corruption Policy (“**Policy**”).
- 1.3 Adherence to the guidelines set out in this Policy will ensure that the Group and the employees comply with anti-bribery and anti-corruption laws and governmental guidance.

2. POLICY STATEMENT

- 2.1 Bribery is a serious criminal offense in countries in which the Group operates. As part of the commitment to uphold the highest legal, moral and ethical business practices, all forms of bribery and corruption are not acceptable and will not be tolerated.
- 2.2 L&P does not permit any direct or indirect offer (payments through Business Partners), payment, solicitation or acceptance of any improper payments (bribes, kickbacks or facilitation payment) in any form in connection with the Group’s business dealings or activities.
- 2.3 This Policy applies across all jurisdictions in which the Group operates and to all employees and all intermediaries or any third parties, who represent the Group.
- 2.4 This policy does not preclude reasonable and appropriate hospitality designed to encourage constructive relationships with L&P ’s customers, prospects and other parties rather than influence a particular decision.
- 2.5 L&P maintain detailed and accurate books and records and a system of internal controls that ensure all financial transactions are properly authorised and executed.
- 2.6 All individuals to whom this Policy applies have a responsibility to comply with this Policy and a duty to disclose non-compliance with this Policy without fear of victimization through established reporting procedures in accordance with L&P’s Whistle Blowing Policy.
- 2.7 Any employee who fails to comply with this Policy, whether intentionally or by act of negligence can lead to disciplinary action being taken that could ultimately result in termination of employment.
- 2.8 Breach of the laws in relation to this Policy could also result in civil or criminal proceedings. In relation to intermediaries or third parties who are non- L&P employees, failure to comply with this Policy will result in a notification to the service-provider and/or any applicable

authority to take appropriate remedial action, which may include but not limited to reimbursement for expenses incurred and contract termination.

3. PURPOSE

3.1 The purpose of this Policy is to:

3.1.1. comply with the laws design to combat bribery and corruption in which the Group is based and operates in;

3.1.2. outline the principles and behaviours required to support this commitment; and

3.1.3. outline responsibilities of directors, management, employees, consultants, vendors, suppliers, contractors and any other parties acting as representatives or agents of the Group in observing and upholding the Group's position on anti-bribery and corruption.

4. SCOPE

4.1 This Policy applies to the following parties:

4.1.1. directors, management, employees including trainee, intern, temporary, probation or contract staff of the Group ("**Employees**"); and

4.1.2. agents, consultants, contractors, vendors, suppliers, intermediaries, third party service providers or any other person associated with or acting on behalf of the Group ("**Business Partners**").

5. RELEVANT LAW

5.1 Anti-bribery laws exist in most countries around the world. The legal obligations underlying this Policy are the Malaysian Anti-Corruption Commission Act 2009 ("**Act**") 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 and the anti-corruption laws of the country in which L&P is based and operates in.

5.2 To the extent that the applicable laws of a country in which the Group conducts business conflict with or impose a higher standard than this Policy, the appropriate laws must be complied with.

6. DEFINITIONS

6.1 Bribery is the offer, promise or receipt of any gift, hospitality, loan, commissions, fee, reward, entertainment or other advantage to someone in business or government, directly or indirectly, with the intention of influencing or rewarding the behaviour of someone to obtain or retain commercial advantage. Bribery can also take place where the offer or giving of a bribe is made by or through a third party i.e. an agent, representative or intermediary;

- 6.2 A “bribe” or a “gratification” as defined in Malaysian Anti-Corruption Commission Act 2009 is:
- 6.2.1. money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
 - 6.2.2. any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
 - 6.2.3. any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
 - 6.2.4. any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
 - 6.2.5. any forbearance to demand any money or money’s worth or valuable thing;
 - 6.2.6. any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
 - 6.2.7. any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs 6.2.1 to 6.2.6.

7. GIFTS, ENTERTAINMENT AND HOSPITALITY

- 7.1 Gifts, entertainment or hospitality for the purposes of this policy constitutes anything of value. Giving or receiving gifts or hospitality may foster goodwill in business relationships. L&P permits receiving and providing appropriate gifts, entertainment and hospitality in the following situations:
- 7.1.1. for a genuine purpose;
 - 7.1.2. strictly limited in value and frequency;
 - 7.1.3. given in the ordinary course of business;
 - 7.1.4. conscientiously maintain the highest degree of integrity;
 - 7.1.5. always exercise proper care and judgment;
 - 7.1.6. avoid conflicts of interest;
 - 7.1.7. refrain from taking advantage of your position or exercising your authority to further your own personal interest at the expense of L&P; and
 - 7.1.8. in accordance with all applicable laws and regulations, including recipient’s own rules.

- 7.2 Gifts are benefits of any kind given to someone as a sign of appreciation or friendship without expectation of receiving anything in return. They include “courtesy gifts” which are small gifts given at a culturally recognized occasions i.e. weddings, funerals or special times of the year i.e New Year, Christmas
- 7.3 Entertainment generally includes attendance at plays, ticket to social entertainment such as concerts and sporting events.
- 7.4 Hospitality generally includes provision of friendly reception such as refreshments, meals and accommodation.
- 7.5 Gifts that are below RM100.00 is generally acceptable. Employees are expected to declare all gifts, entertainment & hospitality received to Human Resource Department (“HR”) via Gift, Entertainment & Hospitality Declaration Form as provided by HR. For acceptance of gifts, HR to decide whether retain by individual department or surrender to L&P.
- 7.6 Employees must always seek prior approval from their department heads before accepting or offering:

Category	Threshold	Procedure
Gift	Equal or above RM100	If accept or offer, declaration need to be made and seek approval from Chief Executive Officer (“CEO”). For acceptance of gifts, HR to decide on the most appropriate way of retaining or allocating the Gift
Entertainment/ hospitality	Equal or above RM200 per individual	Approval by CEO

8. TRAVEL AND SPONSORED TRAVEL

- 8.1 All personnel may accept lodging and other expenses (e.g. food, transportation) provided by Counterparties, Business Partners or other stakeholders within the host country if the trip is for business purposes and prior approval has been obtained from CEO. The cost of travelling to the host country must be borne by L&P itself.
- 8.2 Sponsored travel refers to circumstances where L&P pays the travel expenses i.e. airfare, hotel, meal and other incidental of individuals who are not L&P Employees or representatives.
- 8.3 Sponsored travel generally is allowed. On some occasions, Employee may invite a third party for visit to L&P’s facilities for promotion and demonstration of L&P’s products and services. Payment or reimbursement of bona fide expenditures such as travel and hotel expenses, incurred by or on behalf of the third party for such a visit is permissible provided that:
 - such expenses are legitimate business purpose;
 - such expenses are modest and reasonable; and

- it is in accordance with all applicable laws and regulations, including recipient's own rules.

8.4 Employees must disclose and obtain prior approval from the CEO before the sponsored travel expenses are incurred.

8.5 Travel and lodging expenses should be paid directly to third-party provider i.e. airlines or hotels or travel agent that has selected for travel arrangements. Provide money to individual to make his/her own travel arrangements is not permissible.

8.6 All expenses shall be recorded accurately and in detail.

9. FACILITATION PAYMENTS AND KICKBACKS

9.1 The Group prohibits making or accepting, facilitation payments or kickbacks of any kind, either directly or indirectly.

9.2 Facilitation payments are unofficial, improper, small transfers of value offered or made to secure or expedite a routine or necessary action to which we are legally entitled.

9.3 Kickbacks are typically payments made in return for a business favour or advantage.

9.4 Any individual with any suspicious, concerns or queries regarding a payment made on the Company's or Group's behalf or improper business practices, he or she should raise these by reporting to their manager without delay, who will then ensure that the CEO is informed at the earliest possible opportunity or report via the channel as outlined in the Whistleblowing Policy.

10. CHARITABLE DONATIONS AND SPONSORSHIP

10.1 As part of L&P's corporate citizenship initiatives, L&P supports a number of charitable causes by making donations, whether by way of cash payments or the provision of services in kind i.e. technical assistance or training.

10.2 Any donations and sponsorship on behalf of L&P must be transparent and for legitimate purpose, given through legal and proper channel. Care should be taken to ensure that recipient charity or sponsored organisations on receiving end are bona fide bodies, able to manage the funds properly and any funds are not diverted to other beneficiaries.

10.3 All personnel should also avoid situations where conflicts of interests could arise from making donations or sponsorships. Beware of making contributions to charities or sponsored organisations that may have links to government officials or their families, as this could be seen as an act to influence the official's decision in gaining benefit to L&P.

10.4 L&P will not sponsor events or activities that are:

- not align with L&P 's values and Code of Conduct & Ethics; and

- associated L&P with event, individual or other organizations that could bring L&P into disrepute.

10.5 All charitable donations and sponsorships must be approved in accordance with the authority limits in L&P Delegation of Authority Procedures (“**DoA**”).

10.6 L&P shall keep accurate records of all donations made by L&P.

11. POLITICAL CONTRIBUTIONS

11.1 L&P is neutral in matters of party politics. It does not make contributions to any political parties, organisations, or individuals engaged in politics. However, as part of the Group good corporate citizenship initiatives, it may in certain cases use the Group resources (including monetary and in-kind services) to support candidates, committees, or organisations that are committed to economic development and technology innovation.

11.2 Political contributions are monetary or non-monetary contributions to support political parties, politicians or political activities.

11.3 Political contributions can only be made if:

- they are made in accordance with applicable laws and regulations;
- they are not made with the expectation of a direct or immediate return for L&P;
- they are appropriately documented and reported; and
- they are approved by the Board of Directors.

11.4 Employees may choose to make personal contributions from their own money, subject to applicable legal limits and requirements. Employees will not be reimbursed by L&P directly or indirectly for their personal contributions or expenses.

12. PUBLIC OFFICIALS

12.1 The principles of this policy apply to dealings across both public and private sectors, dealing with Public Officials required a particular care because Public Officials are often subject to stricter rules and restrictions that do not apply to individuals who operate in private sector.

12.2 Public Officials include those in government departments, employees of government owned or controlled commercial enterprises, public international organisations i.e. United Nation, political parties and political candidates for a political office, any person acting in an official capacity for or on behalf of a government or a government department, government agency, or of a public international organization and any other person who is considered to be a public official according to applicable laws and regulations.

- 12.3 Any dealing with Public Officials must be in strict compliance with the rules and regulations to which they are subject or that have been imposed by their employer.
- 12.4 Any benefit conveyed to a Public Official must be transparent, reasonable, appropriate and only for legitimate business purposes.
- 12.5 All cost and expenses related to Public Officials must be properly documented and accurately recorded.
- 12.6 Approval from the CEO is required prior to offering a gift or hospitality to any Public Officials in relation to:
- paying or reimbursing travel, hospitality or entertainment expenses i.e. airfares, meals or hotel bills;
 - making gifts; and
 - making charitable contributions.

13. BUSINESS PARTNERS

- 13.1 Employees should seek to ensure that any associated Business Partners will not offer, make, solicit or receive improper payment on behalf of the Group. Before engaging a Business Partners, Employees should ensure:
- there is a legitimate need for the goods or services that they provide;
 - the Business Partners is appropriate for the role (by reference to their expertise and any possible conflict of interest);
 - the services and goods are priced at no more than market value; and
 - there is a written contract or other written document with a similar legal effect i.e. Purchase Order.
- 13.3 It is Employees responsibility to communicate this Policy to associated Business Partners and represent the Group interest. They will be abided by the L&P Code of Conduct & Ethics and the principle set out in this policy when working on the Group's behalf. If those principles are breached, the Group will reserve the right to terminate the agreement or contract.
- 13.4 There may be circumstances which suggest the associated Business Partners may pose a high corruption risk, the Employees should consult with their manager to assess whether there is a need for enhanced due diligence and monitoring, or whether a proposed relationship should not proceed.
- 13.5 Employees should not enter into any business dealings with any third party if he/she reasonably suspect of Third Party engaging in bribery and improper business practices unless those suspicious are investigated and resolved.
- 13.6 Employees shall be responsible for ensuring commission or other payments to Business Partners under an approved contract or agreement are properly recorded, approved and paid in accordance with the contracts or agreements and any other legal requirements.

- 13.7 All payments to associated Business Partners must be made by direct bank transfer (not to any third party) into the country in which the associated Business Partners has its principal place of business or performs substantial services on behalf of the Group. Any request for payment not directly to the Business Partners or in a manner that is not in accordance with this Policy must be approved by the CEO.

14. RECORD KEEPING

- 14.1 All payment and expenses, including those related to gifts, hospitality as well as sponsorship and donations must be accurately and transparently recorded to reflect the nature and purpose of the activity.
- 14.2 Approval documents must be accurately recorded for verification of internal and external auditors.
- 14.3 All applicable control and approval procedures must be followed.

15. MONITORING AND REVIEW

- 15.1 The Board has ultimate responsibility for ensuring this Policy complies with the Group legal and ethical obligations.
- 15.2 It is the responsibility of every L&P's manager to implement this Policy within his/her area of function and provide guidance to staffs reporting to him/her.
- 15.3 The Board of Directors will monitor the effectiveness, review adequacy and ongoing compliance with this Policy. Internal control systems and procedures designed to prevent bribery and corruption will be subject to regular audits by Internal Auditor to provide assurance that they are effective in countering bribery and corruption.
- 15.4 Any Employees who breaches this Policy will lead to disciplinary and other actions up to and including termination of employment.

16. TRAINING AND COMMUNICATION

- 16.1 L&P will make this Policy available on L&P 's Intranet i.e. Sharepoint for all Employees.
- 16.2 Dissemination of this Policy for new employees will be carried out at the time of induction.
- 16.3 Head of Department should ensure that this Policy and subsequent applicable amendments as they are updated from time to time is duly communicated and implemented, and that the Employees working for him/her and Business Partners within his/her responsibility are familiar with and observed the requirements included in this Policy.

- 16.4 This Policy should be communicated to the associated Business Partners at the beginning of business relationship with them and as appropriate thereafter. Business Partners are required to adhere to L&P's associated Business Partners Code of Conduct and this Policy at the outset of business relationship.

17. REPORTING SUSPICIOUS ACTIVITIES

- 17.1 Any Employee who believe or suspect that a potential breach of this Policy is required to report to their immediate manager/supervisor at first instance.
- 17.2 However, where an Employee feels uncomfortable in raising their concern in this manner, wish to remain anonymous or unsatisfied with the response received, the concern can be raised using the procedures provided for in the L&P Whistle Blowing Policy, a copy of detailed procedures on whistleblowing can be obtained from HR Department or at L&P 's web page.
- 17.3 L&P will not tolerate retaliation in any form against anyone for raising concern or reporting any improper, unethical or inappropriate behaviour.

18. CONFIDENTIALITY AND PROTECTION

- 18.1 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. L&P encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.
- 18.2 L&P is 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 unfavourable treatment connected with raising a concern.

19. AMENDMENT

- 19.1 This policy is subject to amendment at any time so as to improve its effectiveness at combating bribery and corruption. Any amendments will be notified in writing to employees.



L&P Global Berhad

Rev 000

(Formerly known as Berjayapak International Holdings Sdn. Bhd.)

Company No.: 202101028085 (1428385-M)

(Incorporated in Malaysia)

Gift, Entertainment & Hospitality Declaration Form

Date:

Name

Department

Position

Gift / Entertainment

Receiving

Giving

Request for receipt from / provision to

Individual / Organisation Name

Relationship of the individual/organisation with L&P e.g. customer, potential customer, vendor / potential vendor

Provide details of the gift / entertainment and its purpose

Number of times *to indicate if it is more than once from/to the same party within 12 months

_____ Amount (RM) _____

To be completed by HR Manager

Shall the gifts and entertainment be approved

Yes

No

Receipt of gifts/entertainment only

Offering of gifts/entertainment only

Please indicate the decision with "x"

Please indicate the decision with "x"

Display at L&P premises

To present

Retained as giveaways at L&P function

Not to present

Giveaway to employee

Employee name _____

Remark
