



POLYMER LINK HOLDINGS BERHAD

Registration No. 201301011960 (1041798-A)
(Incorporated in Malaysia under the Companies Act 1965
and deemed registered under the Companies Act 2016)

**ANTI-BRIBERY AND CORRUPTION
POLICY**

Anti-Bribery and Corruption Policy			
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1.0 INTRODUCTION

- 1.1 The ABC Policy (as defined below) guides employees on how to recognise and deal with improper solicitation, bribery, and any other corruption activities and issues that may arise in the course of business.
- 1.2 The Policy (as set out in Section 2 of this Policy) is intended to provide employees with a basic introduction on how to avoid and combat bribery and corruption in furtherance of Polymer Link Holdings Berhad (“**Company**”) and its subsidiaries’ (“**Polymer Link**” or the “**Group**”) commitment to lawful and ethical behavior at all times. This Policy is not intended to be exhaustive. In line with the objective of this Policy for the Group to uphold high levels of ethics and integrity, employees shall adhere to the substance and spirit of this Policy at all times. They shall always ask for clarification, whenever in doubt.

2.0 SCOPE

- 2.1 This Policy applies to all the Group’s Directors and Employees, including their immediate family members and relatives. This Policy also applies to Suppliers, and Business Associates of the Group.

- 2.2 Definitions in this Policy:-

“Act” means the Companies Act 2016.

“ABC Policy” or “Policy” means the Group’s Anti-Bribery and Corruption Policy.

“Board” means the Board of Directors of the Company.

“Business Associate” means any person performing services for or on behalf of the Group, apart from the Group’s Employees, including consultants, contractors or subcontractors, trainees, seconded staffs, volunteers, interns, agents, sponsors, service providers, associates, and business partners.

“Director” or “Directors” means the director(s) of the Company and its group of companies and shall have the meaning given in Section 2(1) of the Act and Section 2(1) of the Capital Markets and Services Act 2007

“Employees” means any person at all levels and grades, including senior managers, managers, executives, non-executives, workers whether full-time, part-time, contract, or temporary, employed by the Company and/or its subsidiaries.

“Supplier” refers to the Group’s suppliers of trade and non-trade goods.

- 2.3 Joint-venture companies in which the Company is non-controlling or co-venture, and associated companies are encouraged to adopt these or similar principles. Third parties’ intermediaries who provide or shall provide products and services and act on behalf of the Group shall be made aware of this Policy and our standard operating procedures. Joint-venture companies and third parties’ intermediaries are also expected to comply with this Policy in relation to all work conducted with the Group or on behalf of the Group.

- 2.4 This Policy applies in all countries, territories or jurisdictions where the Group operates. Where local customs, standards, laws or other local policies apply that are stricter than the provision of this Policy, the stricter rules shall be complied with. However, if this Policy stipulates stricter rules than local customs, standards, laws or other local policies, the stricter provisions of this Policy shall apply.

3.0 RECOGNITION OF LOCAL AND INTERNATIONAL LEGISLATION

- 3.1 The Company is committed to conducting its business ethically and in compliance with all applicable laws and regulations, as amended from time to time, in the countries where it does business.
- 3.2 These laws include but are not limited to the Malaysian Penal Code (revised 1977) (and its amendments), the Malaysian Anti-Corruption Commission Act 2009 and its amendments, the Companies Act 2016, Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 and Singapore's Prevention of Corruption Act 1965 and applicable laws and regulatory requirements related to corporate liability in term of anti-bribery and anti-corruption in the countries or jurisdictions where the Group operates. These laws prohibit bribery and acts of corruption and mandate that companies establish and maintain accurate books and records and sufficient internal controls.
- 3.3 In cases where there is a conflict between mandatory laws and the principles contained in this and other policies, the law shall prevail.

4.0 THE GROUP'S ANTI-BRIBERY STANCE

- 4.1 The Group has a zero-tolerance policy towards bribery throughout its businesses, regardless of country of operations.
- 4.2 The Group prohibits its Directors, Employees, Suppliers, or Business Associates from undertaking any bribery conduct when conducting business with, for, or on behalf of the Group.
- 4.3 The prohibition on bribery extends broadly to include:
- (a) bribes: When one party is giving or offering or receiving or soliciting another party, either directly or through a third party of anything of value, advantage, or benefit of any kind to influence the making or not making, or implementation of a decision or act by the party concerned such as to retain or obtain business or a business advantage. This also includes giving, promising to give, or offering a payment, gift, or entertainment to a third party to 'facilitate' or expedite routine procedures.
 - (b) anything of value may include but is not limited to cash, cash equivalents, discounts, donations, travel expenses, entertainment, stocks, or gifts.
 - (c) facilitation payments, also known as grease payments, are unofficial and improper payments or benefits provided to secure or expedite a routine or necessary action to which the Group is legally entitled.

5.0 DOING BUSINESS WITH INTEGRITY

The Group believes in conducting business with parties who uphold the same values and standards of business ethics and integrity as a Group. This includes its business relationships with its Directors, Employees, Suppliers, and Business Associates.

6.0 GIFTS, ENTERTAINMENT, AND CORPORATE HOSPITALITY

- 6.1 The Group has adopted a 'No Gift' Policy whereby, subject only to specified exceptions prescribed under Section 6.3 of this Policy, all Directors, Employees, Suppliers and Business Associates acting for or on behalf of the Group are prohibited from, directly or indirectly, receiving and/or providing gifts.
- 6.2 It is the responsibility of Employees, Directors, Suppliers and Business Associates of the Group to inform external parties involved in any business dealing with the Group that our Group practices a 'No Gift Policy' and to request the external party for their understanding and attentiveness for and adherence to this Policy.
- 6.3 Gifts, entertainment, or corporate hospitality which can influence or be perceived to be able to influence business decisions or outcomes can be construed as bribes and they shall not be given or received by the Group's Directors, Employees, Suppliers, or Business Associates when in the conduct of the Group's business. Similarly, gifts, entertainment, or corporate hospitality shall be avoided where a conflict of interest situation is present. Generally, the Group's practice for giving and receiving gifts are limited to the following situations (in the following situations, an "Organisation" may refer to the Group or an external party):
- (a) The Group's personnel shall seek prior approval from their department or function heads for all gifts or benefits received or offered with a value of more than RM500.00 or equivalent prior to final acceptance.
 - (b) Any gifts or hospitality with a notional or actual value in excess of RM500.00 or equivalent or equivalent shall be approved by the Executive Vice Chairman/President & Group CEO ("**Group CEO**") and/or any one Director of the Company and the relevant subsidiaries.
 - (c) With regards to the offering and acceptance of gifts and hospitality for Malaysian public officers, the value shall not exceed the allowable amount as stated in the Service Circular No. 3 of 1998 (Surat Pekeliling Perkhidmatan Bilangan 3 Tahun 1998) and the Service Circular No: 5 of 2008 (Surat Pekeliling Perkhidmatan Bilangan 5 Tahun 2008).
 - (d) With regards to the offering and acceptance of gifts and hospitality for overseas business partners, the value shall not exceed the allowable amount as stated by the respective country's Anti Bribery and Anti-Corruption Law.
 - (e) Gifts with the maximum notional value or equivalent mentioned above and, in any event, shall not occur more than three (3) times a year with the same person. All approvals shall be given in writing, and records of gifts received, from whom and by whom, shall be recorded in an office or function log established for such purpose.
 - (f) Hospitality (meals, travels & accommodation and entertainment) also shall not exceed RM500.00 and in any event and shall not occur more than 3 times a year with the same person.

- (g) Agreed standard market rebates, reductions, discounts or similar advantages in business to business transactions are allowable and shall be incorporated in the contracts. Any benefits are only for the organization (instead of individuals) and shall be made transparent by the parties to the management.
- (h) Paying routine government fees, if this is so required by applicable regulations is allowable and it shall not benefit an individual. However, facilitation payment is not permitted.
- (i) Recording of gifts - A log of all gifts given or accepted shall be recorded and kept. This include a record of the gift's nature and value, the names of the giver and the recipient, the reason or occasion for the gift, and the fact of the approval of the giving or retention of the gift. Such logs shall be filed and maintained for review by top-level management.
- (j) gifts given by the Group to Employees and Directors and/or their family members in relation to an internal or externally recognised function, event, or celebration of the Group (e.g. in recognition of an Employee's/Director's service to the Group);
- (k) exchange of gifts at organisation-to-organisation level (e.g. gifts exchanged between companies as part of an official company visit/courtesy call and thereafter said gift is treated as company property);
- (l) gifts to external institutions or individuals in relation to an organisation's official functions, events, and celebrations which is commonly given in public (e.g. commemorative gifts or door gifts offered to all guests attending the event);
- (m) token or corporate gifts of nominal value, normally bearing a corporate logo (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, or stakeholders attending events such as conferences, exhibitions, training, trade shows, etc. and deemed as part of an organisation's brand building or promotional activities; and
- (n) gifts to external parties who have no business dealings with the Group (e.g. monetary gifts or gifts-in-kind to charitable organisations).
- (o) token or corporate gifts must not affect the independent business judgement of the intended recipients.
- (p) there must not be any corrupt/criminal intent involved in giving or receiving the gifts.
- (q) nominated Employees, Employees on duty, Directors and Business Associate(s) who are eligible and/or required to participate in the Group inspection trips and/or other business-related trips including problem solving trips (local or overseas), and the expenses are sponsored by the Group.
- (r) hotel accommodation in conjunction with the Group's events and trips whereby the expenses are fully sponsored by the Group.
- (s) monetary gifts such as "Ang-pow" red packets with an amount equivalent to RM500 or less received from customers or business associates during festive occasions (e.g. Chinese New Year, Hari Raya Aidilfitri, and Deepavali) following tradition is acceptable and no declaration is needed.

- 6.4 The Group's Employees and/or Directors are not allowed to provide gifts to third parties or customers exceeding the aforesaid prescribed limit unless they obtain prior approval from the Group CEO or any one Executive Directors of the Company and the relevant subsidiaries.

7.0 DONATIONS, SPONSORSHIPS, AND POLITICAL CONTRIBUTION

- 7.1 The Group does not make donations or contributions to political parties, nor does it sponsor any political events. This, however, does not prohibit any individual from making donations or sponsorships under their personal capacity provided that the donations or sponsorships must not be associated with the Group.
- 7.2 Contributions or donations made by the Group need to be made in good faith and in compliance with the Group's Code of Conduct and Ethics, this Policy, and all relevant Group's policies and procedures. Below are the policy and procedures of the Group for charitable Donations (Contributions and Sponsorships):-
- (a) The Group does undertake social and philanthropic programmes that are in line with their respective business strategies or that will benefit the broader interests of the community, while complementing the efforts of the industry and Government.
 - (b) As part of its corporate citizenship activities in term of Environmental, Social and Governance (ESG), the Group accepts and indeed encourages the contributions to charitable organisations – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) or provide sponsorship, to environmental, social and governance event and that shall be made directly to an official entity and agrees to disclose all charitable contributions it makes.
 - (c) Any such charitable contribution, sponsorship or donation made are legal and ethical under local laws and practices and shall be transparent and properly documented. Such contribution, sponsorship and donation are only offered and made with the approval of the authorised personnel duly authorised by the Board.
 - (d) Appropriate due diligence shall be conducted on the proposed recipient charity and a full understanding obtained as to its bona fides to ensure that charitable donation, contribution and sponsorship are not used to facilitate and conceal any acts of bribery.
- 7.3 Below are the policy and procedures of the Group for political contribution
- (a) The Group has a policy of strict political neutrality; it does not make political donations or contributions to any political parties, organisations, or individuals engaged in politics nor does it incur any political expenditure.
 - (b) The Group shall co-operate with governments and other official bodies in the development of policy and legislation that may affect its legitimate business interests, or where it has specialist expertise.
 - (c) The Group's personnel are entitled to his or her own political views and activities, but shall not use the Group's premises or equipment to promote those views or associate their views with those of the Group.

- (d) The Group respects the right of individual personnel to make personal contributions, provided they are not made in any way to obtain advantage in a business transaction.
- (e) The Group communicates views to government and others, on matters which affect its business interests or those of its shareholders and personnel, as a way of assisting in the development of regulation and legislation affecting the business.

7.4 Below are the Facilitation Payment Guideline of the Group

- (a) Facilitation payments fall within the interpretation of “gratification” under MACC Act (Act 694). Making facilitation payments to officers in the public sector (including foreign public officials) is deemed to constitute an offence under prohibitions set out in MACC Act.
- (b) In some cases, the facilitation payments is expressly requested. In other cases, there is no any expressed request, but the body language of the official or delay in issuing a permit may indicate that the official expects a form of payment or inducement.
- (c) Facilitation payments are unofficial payments that can be made in cash and non-cash with the intention to gain access, secure or expedite the performance of a routine function.
- (d) Directors and/or Employees of the Group shall not make such unofficial facilitation payments or extra payments in order to secure or expedite routine administrative actions, such as government papers, customs clearances, visas, permits or licenses.
- (e) If Directors and/or Employees encounter such demand for a facilitation payment, or they are likely to do so, they shall report the situation to their superior or line manager without delay. Superior or Line managers shall then ensure that the Group CEO is informed at the earliest possible opportunity.
- (f) The Group recognise that demands for facilitation payments are often backed by a form of extortion and that in exceptional circumstances resistance is not be feasible. An extreme example would be a demand for payment to secure an emergency admission into hospital or enter and exit across war-torn boundaries.
- (g) Where the facilitation payment is being extorted or Directors and/or Employees of the Group are being coerced to pay for it and their safety or liberty is under threat or they feel that they have no alternative but to pay for personal or family safety and peace of mind. In such circumstance, then they are allowed to pay the facilitation payment.
- (h) In such dangerous situations, the Group allows Directors and/or Employees to make facilitation payments. The Group accepts that Directors and/or Employees need to use their best judgement. The concerned personnel shall report such incident where they feel forced to make a facilitation payment to their superior or line manager at the earliest opportunity.
- (j) The Group shall stand by their Directors and/or Employees who find themselves placed in exceptional situations provided that the personnel have provided absolute transparency as to the circumstances surrounding a payment shortly after the incident has occurred.

8.0 PROCUREMENT PROCESS

- 8.1 The Group has established policies and procedures addressing the selection of Suppliers and Business Associates. The selection of Suppliers and Business Associates is based on merits such as quality, pricing, capability, track record, and experience, and it shall be in the best interest of the Group.
- 8.2 Due diligence forms part of the Group's selection of new Suppliers and Business Associates and due diligence review shall also be performed on existing Suppliers and Business Associates from time to time.
- 8.3 Suppliers and Business Associates are required to provide written acceptance and acknowledgment of the Group's applicable policies.

9.0 COMPLIANCE AND REPORTING A CONCERN

- 9.1 The Group takes combating corruption and bribery very seriously. Any violation of this Policy shall be regarded as a serious matter by the Group and is likely to result in a review of the relationship, including disciplinary action, dismissal, or termination, consistent with applicable laws and regulations.
- 9.2 All the Group's Directors, Employees, Suppliers, and Business Associates are required to be familiar with and comply with this Policy.
- 9.3 An Employee and Director shall notify his or her superior as soon as possible if he or she believes or suspects that a breach of this Policy has occurred or may occur. Alternatively, the Employee may raise his or her concerns in accordance with the Group's Whistle-Blowing Policy.
- 9.4 The Group's Directors, Suppliers, and Business Associates or members of the public can also raise their concerns regarding any known breaches or suspected breaches of this Policy through the Group's Whistle-Blowing Policy, which is available on the Group's corporate website. Whistleblowers shall be accorded the protection as set out in the Whistle-Blowing Policy.

10.0 RECORD-KEEPING

- (a) The Group shall keep detailed updated and accurate financial and non-financial records related to this Policy and procedures governing anti-bribery and anti-corruption measures, and shall have appropriate internal controls in place to act as evidence for all payments made.
- (b) Our objective of accurate book and record keeping is to maintain accurate and precise records in order to be transparent. The Group shall not:
 - (i) Falsify, omit, misstate, alter or conceal any information or otherwise misrepresent the facts on a company record;
 - (ii) Encourage or allow anyone else to compromise the accuracy and integrity of our records;
 - (iii) Intentionally make a false or misleading entry in a record, report, file or claim; and

- (iv) Engage in any scheme to defraud anyone.
- (c) All transactions shall be accurately, completely, and timely recorded in our financial books. The records shall accurately reflect and disclose the business rationale, purpose, substance and legality of all our local and cross-border transactions, payments and expenses, including gifts and hospitality.
- (d) The Group personnel shall declare all gifts and hospitality accepted or offered and submit details to the person in-charge who is assigned by the respective subsidiary and department for recording into a register which shall be subject to internal audit review.
- (e) All personnel of the Group shall also ensure that all expense claims relating to gifts, hospitality, gifts or expenses incurred to third parties shall be approved by the Group CEO or any one Directors of the Company and the relevant subsidiaries. The reason for such expenditure must be specifically recorded.
- (f) The finance department of the Group shall maintain and keep a written record of all gifts and hospitality accepted or offered, and ensure such expenses claims incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure which shall be subject to managerial review.
- (g) All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, Suppliers and business contacts, shall be prepared and maintained with strict accuracy and completeness. No accounts shall be kept "off-book" to facilitate or conceal improper payments.
- (h) The Group shall have appropriate internal controls in place, which shall evidence the business reason for making payments to third parties.

11.0 TRAINING AND COMMUNICATION

- 11.1 The Company and its subsidiaries will provide training on the ABC Policy as part of the induction process for all new Employees and the Group Human Resources Department shall maintain all records of trainings related to anti-bribery and anti-corruption attended by all Directors and Employees of the Company and its subsidiaries. In addition, from time to time and as determined by the Group, Directors, Employees, Suppliers, and Business Associates, especially those operating in areas that are exposed to high bribery risk, shall be provided with relevant training on how to implement and adhere to this Policy.
- 11.2 Our zero-tolerance approach to bribery and corruption must be communicated to all Directors, Employees, Suppliers, and Business Associates at the outset of our relationship with them and as appropriate thereafter. A copy of this Policy, including any amendments as shall be made from time to time, is made available on our website.
- 11.3 The Group recognises the value of integrity in its Directors, Employees, and Business Associates. The Group's recruitment, training, performance evaluation, remuneration, recognition, and promotion for all the Group's Employees, including the management of the Company, shall be designed and regularly updated to recognise integrity.
- 11.4 Due diligence procedures such as background checks on the person or entity, a document verification process, or interviews may be carried out prior to entering into any formalised relationships.

- 11.5 The Group does not offer employment to prospective personnel in return for their having improperly favored the Group in a previous role.

12.0 MONITORING AND REVIEW

- 12.1 All the Group's Directors, Employees, Suppliers, and Business Associates are responsible for the success of this Policy and shall ensure they disclose any suspected unethical business practices or wrongdoing. Any feedback or suggestions regarding inadequacies in this Policy can also be provided to the following channels pursuant to the Whistle-Blowing Policy of the Group:

- (a) by mail in a properly sealed envelope and indicated "Strictly Confidential – To Be Opened by Addressee Only" and addressed to:-

POLYMER LINK HOLDINGS BERHAD

Lot 99045
Jalan Tun Perak 1/KU16
Perdana Industrial Park
42000 Pelabuhan Klang
Selangor Darul Ehsan

Attention: Chairperson of the Audit and Risk Management Committee

- (b) by written mail or email to the Chairperson of the Audit and Risk Management Committee: - Email: ethics@polymerlink.net
- 12.2 The Audit and Risk Management Committee shall ensure a regular review and monitoring are conducted to assess the performance, efficiency and effectiveness of the anti-bribery programme, and ensure the programme is monitored and enforced. Such reviews may take the form of an internal audit, or an audit carried out by an external party. The reviews shall form the basis for any efforts to improve existing anti-bribery anti-corruption controls.
- 12.3 The Board and the management of the Group are responsible for monitoring the effectiveness of this Policy and shall review the implementation of the ISO37001 Anti-bribery Management System (ABMS) and Guidelines on Adequate Procedures (GAPs) issued by Prime Minister Department on a regular basis so as to assess and ascertain its suitability, adequacy and effectiveness.
- 12.4 The Group shall conduct regular bribery risk assessment to identify the potential bribery and corruption risks affecting the business, set anti-bribery and anti-corruption objectives, and assess the effectiveness of the controls in achieving those objectives, at least once every three (3) years. The scope, findings and results shall be properly updated and documented. The Board and the Risk Management Committee shall be kept informed of the identified risks.
- 12.5 Any deviation or waiver from this Policy shall be recommended by the Risk Management Committee for approval by the Board.
- 12.6 All the personnel of the Group are responsible for the success of this Policy and shall ensure they use it to disclose any suspected danger or wrongdoing.
- 12.7 Personnel of the Group are invited to provide feedback and comment on this Policy and suggest ways in which it can be improved. Feedback, comments, suggestions and queries shall be addressed to the Chairperson of the Audit Committee pursuant to the procedures set out in the Whistle-Blowing Policy.

- 12.8 This Policy does not form part of any personnel's contract of employment and it may be amended at any time.
- 12.9 The Group regards bribery and corruption as a serious matter. Non-compliance and violation of this Policy shall be subjected to disciplinary actions (e.g., reprimands, demotions, formal warnings, dismissal or termination of employment contract) and any legal proceedings. Further legal action shall also be taken in the event that the Group interests have been harmed as a result of non-compliance.
- 12.10 The Group shall have the right to exercise an audit or inspection on personnel, Business Associates, and third parties' intermediaries who are alleged or reported to be in non-compliance with this Policy.
- 12.11 The Group shall notify the relevant regulatory authority if any identified bribery or corruption incidents have been proven beyond reasonable doubt.
- 12.12 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 decides to take against any convicted personnel.
- 12.13 If any of Business Associates and third parties' intermediaries are found to have breached any anti-corruption policies, laws or regulations or our Anti-bribery Policy, such breach shall result in termination of contract(s) and if required, subject to legal proceedings. The Group has the right to report any matter to the relevant government authorities or law enforcement agencies.

13.0 REVIEW OF THIS POLICY

The Board shall review and assess the relevance and effectiveness of this Policy periodically to assess their adequacy and effectiveness, and in any event, at least once every year, and the Board and the Risk Management Committee of the Company shall ensure that corruption risk is included in its annual risk assessment of the Group. The Board shall also ensure that the relevance and effectiveness of this Policy in keeping with the Group's changing business environment, administrative or operational needs as well as changes to legislation.

14.0 REVISION OF THIS POLICY

The provisions of this Policy can be amended and supplemented from time to time by a resolution of the Board.

-END-