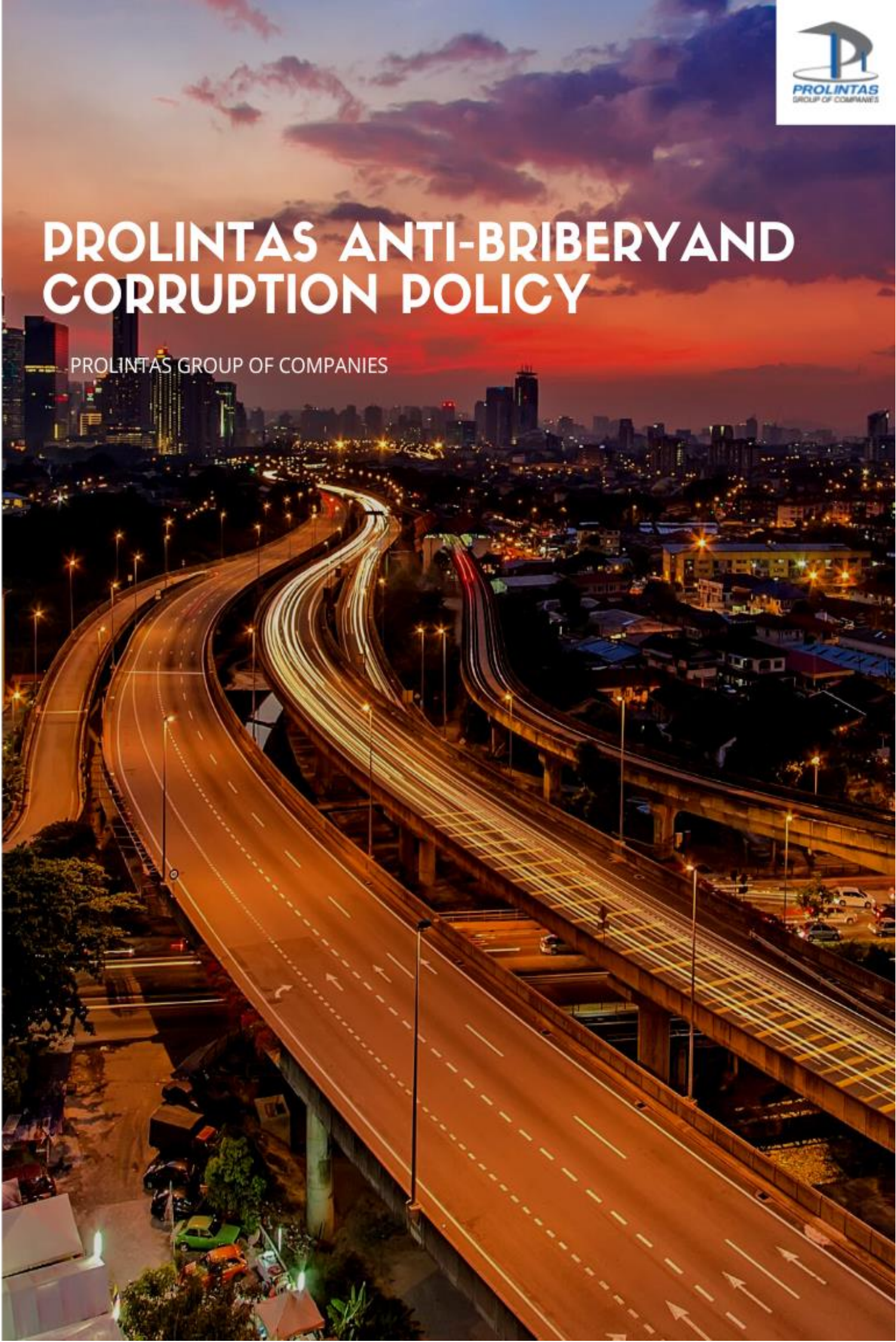


# PROLINTAS ANTI-BRIBERY AND CORRUPTION POLICY

PROLINTAS GROUP OF COMPANIES





## **1. Introduction**

PROLINTAS Group of Companies ("PROLINTAS") has enhanced its standard of governance to strengthen the Group's effectiveness and create value for its stakeholders. A comprehensive set of policies governing the conduct of business, operations and communications have been established to ensure accountability, transparency and ethical practices in delivering service and projects of high impact.

**The Anti-Bribery and Corruption Policy ("ABC Policy" and/or "the Policy")** has been developed as part of the PROLINTAS Anti-Bribery Management System which has been designed to align with the requirements set out in **the Anti-Bribery Management System ('ABMS') ISO 37001:2016**.

Hence, it is important that PROLINTAS complies with and conducts its business in accordance with requirements of all applicable laws, rules and regulations as well as relevant internal policies and procedures.

## **2. Anti-Bribery and Corruption Commitment**

This Anti-Bribery and Corruption Policy Statement ("ABC Statement") is aligned and shall be read together with the PROLINTAS Code of Business Ethics and Conduct, ABMS Policy, Anti-Bribery and Corruption Policy, Whistleblowing Policy, and all the Integrity and Governance Department ("IGD") internal policies and procedures relating to PROLINTAS Group of Companies.

PROLINTAS has adopted a **zero-tolerance commitment** against all forms of bribery and corruption, whether it is committed by the Board of Directors (collectively known as "Board"), senior management, employees of the Company, whether permanent or temporary, business partners, or third parties who are acting for or on behalf of the Company.

PROLINTAS is committed to conducting business ethically and honestly and is committed to implementing and enforcing systems that ensure bribery and corruption are prevented in line with **Section 17A (Corporate Liability)** of the **Malaysian Anti-Corruption Commission Act 2009 (Act 694)**.

This Policy is not intended to provide definitive answers to all questions regarding bribery and corruption, but rather, they are intended to provide its business partners and employees with a basic introduction to how PROLINTAS combats bribery and corruption in furtherance of the group's commitment to lawful and ethical behaviour at all times. Some of the guidelines are designed to prevent situations in which bribery and corrupt practices may take root.

## **3. Application**

The principles and obligations outlined in this ABC Statement apply to all employees of PROLINTAS, including senior management and members of the Board of Directors (collectively referred to as "Board"), and reflects the standards to which PROLINTAS expects its stakeholders, business partners, associates, contractors, and consultants to adhere when acting on PROLINTAS's behalf. This is in line with our Anti-Bribery Management System ("ABMS"), ISO 37001:2016.

PROLINTAS employees shall understand, adopt and adhere to the ABC Policy as well as other policies and procedures diligently.

All stakeholders, business partners, associates, contractors, and consultants shall respect and observe the relevant rules and regulation for anti-bribery and corruption that governs the business and day-to-day operations of PROLINTAS.

## **4. Sanctions for Non-Compliance**

PROLINTAS regards bribery and acts of corruption as serious matters and will apply penalties in the event of non-compliance to this policy. **For PROLINTAS employees, non-compliance may lead to disciplinary action, up to and including termination of employment.**

**For external parties, non-compliance may lead to penalties including termination of the contract.** Further legal action may also be taken if PROLINTAS's interests have been harmed by the results of non-compliance by individuals and organizations.

## 5. Reporting of Policy Violations

- Personnel who, in the course of their activities relating to their employment at PROLINTAS, encounter actual or suspected violations of this policy are required to report their concerns using the reporting channels stated in **PROLINTAS Group of Companies' Whistleblowing Policy**.
- Reports made in good faith, **either anonymously or otherwise**, shall be addressed promptly and without incurring fear of reprisal regardless of the outcome of any investigation.
- Retaliation in any form against PROLINTAS personnel where the person has, in good faith, reported a violation or possible violation of this policy is strictly prohibited.
- Any PROLINTAS personnel found to have deliberately acted against the interests of a person who has in good faith reported a violation, or possible violation of this policy **shall be subjected to disciplinary proceedings including demotion, suspension, dismissal or other actions (including legal action) which PROLINTAS may pursue**.

## 6. Waiver

This ABC Statement shall be reviewed and updated from time to time in compliance with the requirements of all applicable laws. Any deviation or waiver from this ABC Statement must be approved either by the Group Chief Executive Officer or the Board of Audit Committee of PROLINTAS.