



# Anti-Bribery & Corruption Policy



## PURPOSE OF THE POLICY

- to set out the Company's stance against Bribery and Corruption;
- to set out and highlight the duties, roles and responsibilities of Employees, Directors and Business Associates in detecting, preventing and reporting actual, suspected or attempted Bribery and Corruption;
- to provide a general guidance to the public on the Company's policies and procedures, to enable them to make reports of any actual, suspected or attempted Bribery or Corruption to the Company;
- to set out the tone for the Company's adequate procedures pursuant to anti-bribery & corruption laws; and
- to guard and protect the Company against ramifications of acts of Bribery or Corruption.

## SCOPE & APPLICABILITY

This Anti-Bribery and Corruption Policy ("Policy") apply to all Employees, Directors, and Business Associates who have dealings with the Company.

This Policy is not intended to deal with all circumstances relating to Bribery and Corruption, and as such must be read together with all the Company's regulations, standard operating procedures and policies that are applicable to Employees, Directors and Business Associates, including but not limited to:

- Aeon Delight Code of Conduct;
- Code of Ethics for Business Associates;
- Employee Handbook;
- Whistleblowing Policy;
- Gift & Entertainment Policy; and
- Policy Statements on Confidentiality



## RESPONSIBLE DEPARTMENTS

Human Resources Department and Internal Control Department shall be primarily responsible for the implementation, administration and enforcement of the Company's policies relating to Bribery and Corruption:

- Providing Anti-bribery & Corruption awareness program and training to Employees and business associates;
- dealing with any queries regarding the interpretation the Company's policies and procedures relating to Bribery and Corruption;
- monitoring the effectiveness and the use of the Company's policies and procedures relating to Bribery and Corruption and the performance of personnel;
- arranging for the investigation of any matter relating to Bribery and Corruption by an independent function not related to the incident;
- reporting to the Board of Directors regarding issues concerning Bribery and Corruption;
- conduct continual evaluations and improvements on the Company's policies and procedures in relation to Bribery and Corruption; and
- proposing any amendments or changes the Company's policies and procedures relating to Bribery and Corruption to the Board of Directors.

The Departments can be contacted at [integrity@aeondelight.com.my](mailto:integrity@aeondelight.com.my) for any queries or advice on what to do if faced with a concern or situation which could involve Bribery or Corruption, or queries regarding making declarations pursuant to this Policy.

## ANTI-BRIBERY AND CORRUPTION STATEMENT

The Company has a zero tolerance stance against any kind of Bribery or Corruption whether committed within or outside of Malaysia. The Company is committed to the highest level of integrity and ethical practices in all business conduct.

Employees, Directors and Business Associates of the Company are strictly prohibited from soliciting, receiving, procuring, offering, or giving any form of gratification with corrupt intent and are required to adhere to the laws of Malaysia that deal with Bribery and Corruption.

The Company will not hesitate to take any action against, or report to relevant authorities the Employees, Directors or Business Associates who are found to be in breach of the laws of Malaysia dealing with Bribery and Corruption, or in breach of this Policy or any of the Company's policies dealing with Bribery and Corruption. Any violation of this Policy shall constitute a major misconduct, and may result in disciplinary action including dismissal or the termination of a business relationship.



## ANTI-BRIBERY & CORRUPTION CONTROLS

### Receiving Gifts, Entertainment, Hospitality and Travel

The Company has a general “No Gift Policy” which covers any gifts, entertainment, hospitality, travel, donations or other benefits whether tangible or intangible, subject to the exceptions in this Policy.

Exceptions to this “No Gift Policy” are only allowed in the following limited circumstances:

- The gift is a festive gift delivered directly to the Company’s premises. Examples of festive gifts include hampers for festive holidays, dates during Hari Raya, and mandarin oranges during Chinese New Year.

In such circumstances, the Human Resources Department shall receive the festive gift under the Company’s name and distribute the gift to the Company’s employees.

- The gift is a token or souvenir of nominal value, which must be declared to Human Resources Department.

Where a gift, entertainment, hospitality or travel is received by an Employee or Director in their capacity as the Company’s Employee or Director, they should immediately declare this to the Human Resources Department.

Once a declaration has been made, the Human Resource Department shall determine whether any of the exceptions to the “No Gift Policy” apply. If none of the exceptions apply, the gift shall be returned to giver with a letter containing an explanation of the Company’s “No Gift Policy”.

### Giving Gifts, Entertainment, Hospitality and Travel

Employees and Directors are prohibited from giving gifts, entertainment, hospitality and travel to any party including Business Associates, governmental or regulatory authorities, subject to the exceptions stated in this Policy.

Exceptions are only allowed where:

- the gifts, entertainment, hospitality or travel is in line with and permitted by the Company’s Entertainment Policy and any other policy or procedure dealing with giving gifts, entertainment, hospitality or travel;
- the gift is a festive gift delivered in the Company’s name to an external party; or
- the gift is given by the Company at or in conjunction with the Company’s official event, function or celebration. Examples of such gifts include gifts in recognition of the Employee’s or Director’s long service to the Company and lucky draw at the Company’s events.

Extra care must be taken when dealing with Public Officials whether from Malaysia or outside of Malaysia, whereby the same rules regarding gifts, entertainment, hospitality and travel shall apply.



### Donations and Sponsorships including Political Contributions

Donations and sponsorships by the Company to third parties are only permitted in line with the Company's policies pertaining to donations and sponsorships.

In granting donations or sponsorships, including for any Corporate Social Responsibility, the following requirements and principles should be adhered to:

- Approval from Managing Director must be obtained before a donation or sponsorship can be granted.
- The donations to the charity shall be in line with the purposes, objectives and aims of the charity in helping those in need.
- Due diligence must be conducted before a donation or sponsorship is granted to ensure that it is appropriately granted and not an indirect form of Bribery. The nature of the activity, identity, reputation of the recipient, any Conflicts of Interest with the Company, and the legality of the initiative should be considered as part of the due diligence process.
- Verification and periodic monitoring should be conducted on all donations and sponsorships to ensure that they have been appropriately utilised for their intended purpose and not misused.
- Checks must be conducted to ensure that contributions are allowed by the relevant laws.
- All donations and sponsorships should be reflected accurately in the Company's internal records.

Contributions by the Company, or any of its Employees or Directors on behalf of the Company, whether directly or indirectly to political parties or candidates for office are strictly not allowed.

### Facilitation Payments

THE COMPANY regards Facilitation Payments, as defined in this Policy, as a form of Bribery. As such, Employees, Directors, and Business Associates are prohibited from offering, promising, requesting, paying or receiving anything that might be reasonably regarded as a Facilitation Payment.

Exceptions are only permitted where life, health, safety or liberty of the payer or another person is at stake. In such circumstances where a Facilitation Payment has been made to protect a life, a person's health, safety or liberty, the payer must immediately report the Facilitation Payment and the circumstances which gave rise to the threat of life, health, safety or liberty to the MD Office who shall:

- document and keep record of the incident;
- conduct or appoint an independent person to conduct internal investigation;
- communicate the incident to the Board of Directors; and/ or
- report the incident to the relevant authorities.



### Conflict of Interest

The relationship between the Company, its Employees, Directors and Business Associates is based on mutual trust. Employees, Directors and Business Associates are expected to act in line with the Company's best interest.

Employees, Directors and Business Associates therefore have duty to avoid any Conflict of Interest where possible. Examples of how a Conflict of Interest can be avoided include, but are not limited to:

- not engaging subcontractors or businesses that the Company's Employees, Directors or Business Associates, or their Family Members have a direct or indirect interest in or personal relationship with;
- not buying shares in a company that has an existing relationship with the Company;
- not disclosing any information obtained in the course of work that may give an undue advantage to a third party;
- not conducting any personal transactions with the Company's existing or potential Business Associates;
- avoiding taking on employment outside of the Company; and
- avoiding becoming involved in activities that may conflict with business of the Company.

Where it is not possible to avoid an existing Conflict of Interest, or where a situation arises that may give rise to a Conflict of Interest, the Employee or Director is required to immediately declare the Conflict of Interest to Human Resources Department.

### Dealing with External Parties/Business Associates

All dealings with external parties /Business Associates must be carried out in compliance with the policies and procedures of the Company, and relevant laws relating to Bribery and Corruption.

The Company expects all its Business Associates acting for or on its behalf to:

- share the Company's values and standards relating to Bribery and Corruption;
- comply with all applicable laws and the Company's policies and procedures relating to Bribery and Corruption such as Code of Ethics for Business Associates; and
- implement internal controls, policies and procedures to manage the risk of Bribery and Corruption in relation to their dealings with, for or on behalf of the Company.

The Company shall conduct a risk assessment and due diligence on its Business Associates, transactions and projects before entering into a formalised relationship, agreement or arrangement, and will periodically monitor such Business Associates, transactions and projects that have more than a low risk of Bribery and Corruption.



## Procurement

Procurement should be conducted in accordance with the policies, internal processes and procedures relating to procurement.

Employees and Directors are prohibited from offering, promising, requesting, paying or receiving any form of bribe or facilitation payment as part of the procurement process.

There shall be processes and procedures in place to ensure:

- due diligence is conducted on potential Business Associates before a business relationship is formed to ensure they are the most qualified and suitable to conduct the procurement role;
- due diligence is conducted on potential Business Associates before a business relationship is formed to ensure there are no convictions or allegations of Bribery or Corruption against them;
- verification and periodic monitoring is conducted on all works, services, deliveries and supplies associated with the procurement role, to ensure that they are completed accordingly;
- the procurement process is conducted in an efficient, transparent, non-discriminatory and proportionate manner.
- persons involved in the procurement process, including Business Associates, are diligent to avoid situations where an actual or perceived Conflict of Interest could arise.

All persons involved in the procurement process are to make a Declaration of Conflict of Interest to the Human Resources Department (for Directors and Employees) where such situations of actual or perceived conflict may arise.

## Recruitment and Employment

Recruitment of Employees and Directors by the Company must be conducted in accordance with Company's policies, internal processes and procedures relating to recruitment.

In recruiting new Employees and Directors, there shall be processes and procedures in place to ensure:

- background checks are to be conducted on persons, if necessary before they are employed to ensure there are no convictions or allegations of Bribery or Corruption against them;
- there is no Conflict of Interest present in the recruitment process; and any potential Conflict of Interest or red flags raised in hiring a person is recorded and addressed before the person is hired.

In managing existing Employees and Directors, there shall be processes and procedures in place to ensure:

- performance bonuses and incentives are reviewed periodically;
- due diligence is conducted on Employees and Directors before they are transferred and promoted to ascertain that the transfer or promotion is appropriate; and
- Employees and Directors are to be familiar with and have access to the Company's policies dealing with Bribery and Corruption.



### Financial and Non-Financial Controls

The Company shall have in place policies, processes and procedures that provide for financial controls and non-financial controls for the operations where Bribery and Corruption can occur.

Such controls shall include the separation of duties and approval powers, and the requirement for multiple signatories for transactions that have more than a low risk of Bribery and Corruption, among others.

### WHISTLEBLOWING

Employees, Directors, Business Associates and Members of the public are encouraged to channel any concerns regarding actual, suspected or anticipated Bribery or Corruption via:

- Call: toll-free hotline **1800 80 6958**
- Email: **AD-Compliancehotline@kpmg.com.sg**
- Web-portal: <https://ad-compliancehotline.com/>
- Note: Anonymous reporting is allowed

### PERIODICAL REVIEW & MONITORING

The Company is committed to continuously review and monitor and propose improvements to the policies and procedures relating to Bribery and Corruption.

As part of the review, periodic risk assessments, external and/or internal audits will be conducted at least once every 3 years of the Company's anti-bribery and corruption framework.

The Board of Directors of the Company shall periodically review the policies and procedures relating to Bribery and Corruption to ensure they are relevant to the needs, culture and values of the Company and up to date with the laws of Malaysia.



## TRAINING & COMMUNICATION

This Policy and the Company's Whistleblowing Policy shall be publicly available and accessible on the Company's website at <https://aeondelight.com.my>.

Policies dealing with Bribery and Corruption shall be communicated to all Employees and Directors upon their joining the Company, and where relevant, to Business Associates upon the establishment of the business relationship with the Company.

The Company shall conduct training at planned intervals regarding its policies and procedures relating to Bribery and Corruption for Employees. The training shall take into account the results of any risk assessment relating to Bribery and Corruption and shall cover:

- duties of the Employees, Directors and Business Associates to comply with the Company's policies and procedures and applicable laws relating to Bribery and Corruption;
- training on recognising and reporting actual, suspected or attempted Bribery or Corruption;
- how to prevent and avoid incidents of Bribery and Corruption;
- implications and consequences of non-compliance of the Company's policies and procedures and the relevant laws relating to Bribery and Corruption; and
- where or how to obtain further information from the Company.

The attendance of Employees for such training, shall be mandatory.

Any suggestions for improvements to this Policy or to the Company's framework, processes, procedures and controls relating to Bribery and Corruption may be made to the Departments or email to [integrity@aeondelight.com.my](mailto:integrity@aeondelight.com.my).