

# **FACB INDUSTRIES INCORPORATED BERHAD (48850-K)**

## **Anti-Corruption Policy**

### **1. Purpose**

It is our policy to conduct all of our business in an honest, legal and ethical manner.

This purpose of this policy is to establish controls to ensure compliance with all applicable anti-corruption laws and regulations where we operate. FACB Industries Incorporated Berhad and its subsidiaries ("FACBI Group") will conduct and manage all business operations in a legally and socially responsible manner. We uphold all laws and regulations relevant to countering corruption.

Corruption is punishable and carries serious consequences under Malaysian Anti-Corruption Commission Act 2009 ("MACCA 2009"). Where found guilty, a person is liable for fines, imprisonment or a combination of both. We therefore take our legal responsibilities very seriously. We take a zero tolerance approach to corruption.

### **2. Scope**

This policy applies to all forms of corruption in MACCA 2009.

S.17A of the MACCA 2009 imposes a criminal liability on a commercial organization if a person associated to it corruptly gives any gratification with the intent to obtain or retain business, or an advantage in the conduct of business, for the commercial organization.

A person is associated with a commercial organization if he/she is a

(a) director;

(b) partner;

(c) employee; or

(d) person who performs services for or on behalf of the commercial organization.

This policy thus applies to directors and employees of the FACBI Group, and any person who performs services for or on behalf of the FACBI Group.

### **3. Your Responsibilities**

All the associated persons must comply with this policy.

Prevention, detection and reporting of corruption are the responsibility of all the associates. All the associates must not involve in any kind of corruption. All the associates are required to avoid any activity that might breach or lead to a breach of this policy.

You must report in writing to the Head of Group Human Resources (“HGHR”), the Group Auditor (“GA”) or the CEO as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future.

Any director or employee of the FACBI Group who breaches this policy will face disciplinary action, which could result in dismissal. We reserve our right, among others, to terminate our contractual relationship with any third party associates if they breach this policy.

### **4. Record-Keeping**

No accounts must be kept “off-book” on payments.

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

If you are unsure whether a particular act constitutes corruption, please raise it with HGHR or GA before committing. We must declare and keep a written record of all payments which will be subject to managerial review. All accounts and financial records relating to dealing with third parties must be prepared with accuracy and completeness.

### **5. Raising Concerns**

You are encouraged to raise concerns about any issue or suspicion of corruption at the earliest possible stage. If you are unsure whether a particular act constitutes corruption, or if you have other queries or concerns, these should be raised with HGHR or GA.

## **6. Victim of corruption**

It is important that you inform HGHR or GA as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of corruption.

## **7. Protection**

We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. No one should suffer any detrimental treatment as a result of reporting in good faith an actual or potential corruption

## **8. Training and Communication**

This policy forms part of the induction process for all new employees. To all employees, with training where necessary, our zero tolerance approach to corruption will be emphasized within the FACBI Group, and to other associates, communication at the outset of our business relationship and as appropriate thereafter will be emphasized.

## **9. Monitoring and Review**

The Board of Directors of FACBI and senior management have an overall responsibility for ensuring that the FACBI Group complies with all laws and regulations on anti-corruption where the Group operates. Management at all levels have the responsibility for ensuring those reporting to them understand this policy and implement it.

All internal controls, operating procedures, the Group's Code of Conduct & Ethics and Whistle Blowing Policy shall be reviewed from time to time to ensure they are effective in countering corruption.

This policy is viewable in the Company's website [www.facbi.com](http://www.facbi.com)