



NWP HOLDINGS BERHAD

(Company No: 199901020576 (495476-M))

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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Policy Statement

This Anti-Bribery and Corruption Policy (“ABC Policy” of “the Policy”) is to prevent the occurrence of bribery and corruption practices in relation to the businesses of NWP Holdings Berhad and its subsidiaries (“NWP Group” of “the Group”).

The Group is committed to conducting its business in a legal and ethical manner. The Group will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which it operates. The Group are bound by the laws of the Malaysia, including the Malaysian Anti-Corruption Commission Act (“MACC Act”), with regards to its conduct.

The Group ensure that its employees understand their responsibilities in compliance with the Group’s zero tolerance on anti-bribery and corruption within the organization.

Scope

This Policy is applicable to all directors and employees of The Group.

Definitions

Bribery is the offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person in a position of trust within an organisation which would be considered as an offence of giving or receiving ‘gratification’ under MACC Act.

Corruption is the abuse of entrusted power for personal or private gain.

Gratification defined in the MACC Act is to mean the following:

- a) 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;
- b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- e) any forbearance to demand any money or money’s worth or valuable thing;
- f) 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
- g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).

Gifts and Hospitality

The Group accepts that normal and appropriate gestures of hospitality and goodwill are often appropriate courtesies to build good business relationships between the Group and parties that the Group conducts business with.

This Policy does not prohibit the giving or accepting gifts, entertainment and hospitality (whether given to/received from third parties) so long as it is reasonable, lawful and bona fide in nature.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the employee's Head of Department and Human Resources Manager should be sought.

Facilitation Payments and Kickbacks

The Group adopts a strict stance that disallows facilitation payments.

The Group does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

The Group recognises that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

- a) keep any amount to the minimum;
- b) ask for a receipt, detailing the amount and reason for the payment;
- c) create a record concerning the payment; and
- d) report this incident to the involved employee's immediate superiors or Head of Department.

Political Contributions

As a general principal, The Group is not allowed to make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

Charitable Contributions

The Group accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes. Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

All charitable contributions must be reviewed and authorised by the Management or the Board where applicable. There must be adequate proof of receipt by the beneficiaries and all records of contributions must be kept by the Group.

Adherence and Compliance

The Group is committed to conducting business in an ethical manner and shall comply with all applicable laws and regulations wherever it is incorporated and carries on business in. It is obligatory for all employees to read, understand and adhere to the Policy. A breach of any provisions of the Policy may result in disciplinary action.

External parties or agents acting for or on behalf of the Group are expected to understand and comply with the relevant aspect of the Policy. Violation of the Policy may result in blacklisting or termination of contract by the Group.

Record Keeping

The Group will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to managerial review.

Reporting of Policy Violation

Employees who encounter actual or suspected violations of this Policy are required to report their concerns. Each employee has a responsibility to ensure that suspected bribery and corruption incidents are reported promptly.

The Group practices an open-door policy and encourages all employees to share concerns and suggestions with their immediate superiors or Head of Department, or where that is not possible, to the Human Resource Manager.

Reports made in good faith, either anonymously or otherwise, shall be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation.

Monitoring and Reviewing

Internal control systems and procedures designed to prevent bribery and corruption are subject to regular reviews to ensure that they are effective in practice.

Non-compliance identified by the validation or identified through other risk assessments undertaken shall be reported to the Audit and Risk Management Committee.

The Group is committed to continually improving its policies and procedures relating to anti bribery and corruption.