



BP PLASTICS HOLDING BERHAD
**ANTI-BRIBERY AND ANTI-
CORRUPTION (“ABAC”) POLICY**

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1) Title

Anti-Bribery and Anti-Corruption Policy (hereinafter referred to as “Policy”)

2) Purpose

The purpose of this Policy is to:

- a) set out and establish the anti-corruption principles of the Group, and applies to all BPPLAS employees, officers, directors and agents (and or representatives); and
- b) provide information and guideline to all BPPLAS employees, officers, directors and agents (and or representatives), to ensure their understanding and compliance with the Group’s stance in their respective roles and functions, as well as to recognize and deal with bribery and corruption issues.

3) Our Principles

- 3.1 BPPLAS is committed to fair and responsible business and the Group operates within the laws of any jurisdiction in which it does business. One of BPPLAS core value is integrity and we take a zero-tolerance approach to bribery and corruption.
- 3.2 We will uphold all laws relevant to countering bribery and corruption. We remain bound by the laws of the Malaysia, including Malaysian Anti-Corruption Commission (Amendment) Act 2018 (“MACC Amendment Act 2018”).
- 3.3 We are cognizant that bribery and corruption are criminal offences and are punishable for individuals and/or commercial organisations whereby upon conviction, the individual/company will be liable to pay a fine of 10 times the amount of bribes paid, or RM1 million, whichever is higher. Also, the employees, officers and directors representing the company will be liable for jail time not exceeding 20 years.
- 3.4 To address and/or mitigate the bribery and corruption risks, BPPLAS undertake to:-
 - 3.4.1 Implement an effective anti-corruption programme;
 - 3.4.2 Perform annual corruption risk assessment on our operations and review findings;
 - 3.4.3 Implement training programmes for all individual operating in areas of the organization that are identified as high risk; and
 - 3.4.4 Conduct continual evaluations and improvements on the Group’s policies and procedures in relation to corruption

4) Definitions

- 4.1 **Bribe** – This is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for an action, which is illegal, unethical, or a breach of trust or to refrain from acting.
- 4.2 **Corruption** – generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means. Corruption is the abuse of entrusted power for private gain.
- 4.3 **Facilitation Payments** – Typically small payments made to secure or expedite the

performance of a routine or necessary action to which the payer is entitled, legally or otherwise.

- 4.4 **Kickbacks** - The return of a sum already paid or due as a reward for awarding of certain contract. This usually take place in purchasing, contracting or in departments responsible for decision to award contracts.

5) Scope

This Policy applies to all companies, subsidiaries and/or associates within the BPLAS Group. This includes all individual working at all levels and grades, including directors, managers, officers, employees (whether full-time, part-time, contract or temporary), consultants, contractors, trainees, interns, agents, suppliers, customers, any third party and any other person associated with us.

In addition, all third parties doing business with BPPLAS are expected to agree to comply with this Policy.

6) Gifts and Entertainment

- 6.1 While BPPLAS consider the giving and accepting of gifts and entertainment is part of the business norm and acceptable practice in many countries, we wish to caution all individuals involved in such acts to practice the use of good judgment, discretion, and moderation when giving or accepting gifts or entertainment in business settings. However, such practices must be in compliance with the relevant jurisdiction's law and must not violate the giver's and/or receiver's policies on the matter. We must exert caution that we do not act in any manner that would place any vendor or customer in a position where he or she may feel obligated to make a gift, provide entertainment, or provide personal favours to do business or continue to do business with BPPLAS.
- 6.2 The benefits in the gifts and entertainment given or received must be in accordance with the Group's Gifts & Entertainment Guidelines.

7) Facilitation Payments and Kickbacks

- 7.1 BPPLAS prohibits the payment or acceptance of facilitation payments or "kickbacks" of any kind. Facilitation payments are made to public officials to obtain or speed up approvals and routine services, which the officials are required to provide. Examples of facilitation payments:
- Permits, licences or other documents that allow companies to conduct business
 - Inspections related to transit of goods, such as customs clearance, loading and unloading of cargo.
 - Processing of visas and work papers.
 - Certain one-time fees, such as government-owned utility company activating a telephone line
- 7.2 BPPLAS strongly advocate the escalation and reporting of any demands for facilitation and/or kickbacks, whether made directly or indirectly to BPPLAS, or of any demand to or a payment made by a third party acting on BPPLAS behalf. Thus, any person with any knowledge, suspicions, concerns or queries regarding a payment made on our behalf or

improper business practices, should email to the relevant Whistleblowing contact person as per the Whistleblowing Policy as incorporated in the BPPLAS Code of Conduct, which is available at the company's website at www.bpplas.com

8) Political and Charitable Donations/Contribution/Sponsorship

- 8.1 It is the policy of BPPLAS not to make contributions to political candidates or parties.
- 8.2 Donations and contributions to charitable funds and bodies should be made only with the written approval of the Group Managing Director who is responsible for the control of such expenditure.
- 8.3 Donations, contributions or sponsorship made by BPPLAS to community projects or charities need to be made in good faith and in compliance with BPPLAS Code of Conduct, this Anti-Bribery and Anti-Corruption Policy and all relevant BPPLAS' policies and procedures.

9) Corruption Risk Assessment

- 9.1 BPPLAS shall perform annual corruption risk assessment to identify, analyse, assess and prioritise the internal and external corruption risk of the Group.
- 9.2 Upon assessment of the corruption risk, the Top-Level Management is required to establish the appropriate processes, systems and controls to mitigate such risks.

10) Systematic Review, Monitoring and Enforcement

- 10.1 Top-Level Management to review the performance, efficiency and effectiveness of the Policy in appropriate interval with the assistance of the internal auditor and/or external third party assessor.
- 10.2 The Management to take appropriate disciplinary action against anyone who does not comply to the Policy.

11) Responsibilities

- 11.1 Maintaining a good reputation and abiding the country's law is paramount to BPPLAS success in business. Thus, all stakeholders of BPPLAS are advised that we take compliance to this Policy seriously and any violation may cause certain punitive action to be taken which may result in termination, fine or even imprisonment according to the local law.
- 11.2 The Top-Level Management, which includes the Board and senior management, is the main custodian of this Policy and are responsible for ensuring the compliance with this Policy. Every employee, manager, officer and director is required to be familiar with and comply with this Policy. For employees, managers, officers and directors violations of this Policy may lead to disciplinary action up to and including termination of employment.
- 11.3 All employees of BPPLAS to take cognizant that corruption offences is a crime and the

offender would be liable to pay fine and/or face jail time of not exceeding 20 years. The employee will be held accountable if he/she pays a bribe himself/herself or whether he/she authorizes, assists, or conspires with someone else to violate an anti-corruption or anti-bribery law.

- 11.4 If there is any suspicion of a violation of the Policy or if there is a reasonable doubt of a bribery or corruption action, the employee concerned must notify his/her manager as soon as possible. Alternatively, the employee can also make a report to the HR Manager if the report is not conducive to be made to the manager.

12) Record-keeping

- 12.1 All financial records in BPPLAS must be kept or stored accordingly with appropriate internal controls in place which will evidence that business reason for making payments.
- 12.2 Any expense claims relating to gifts or entertainment incurred to third parties are to be submitted in accordance with BPPLAS Gifts and Entertainment Guidelines.
- 12.3 Where applicable, all supporting documents including bills, statements, memoranda and other documents and records relating to dealings with third parties, such as customers, suppliers and agents, should be prepared and maintained with strict accuracy and completeness.

13) Protection

- 13.1 BPPLAS encourages the reporting of any incidences of bribery and corruption and would seek to protect the identity of the whistle blower and the information provided in good faith. Employees should rest assured that the company will investigate all reported cases in confidentiality and fairly without any worry of negative or adverse repercussion when he/she raises genuine concerns in good faith under this Policy even if they turn out to be mistaken.

14) Training and Communication

- 14.1 This Policy will be made known to all existing and potential employees when joining BPPLAS. Relevant training on how to implement and adhere to this Policy will be conducted for all employees on a yearly basis.
- 14.2 BPPLAS shall inform and must communicate our Policy to all suppliers, contractors, agents, business and other partners at the outset of our relationship with them and as appropriate thereafter.
- 14.3 This Policy will be published and made available on the company's website at www.bpplas.com.

15) Whistle-blower Policy and reporting channels

- 15.1 Whistle blowing is a specific means by which an employee/officer (or stakeholder) can report or disclose through established channels, concerns about any violations of the

Code, unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements that is taking place / has taken place / may take place in the future.

- 15.2 While concerns should be raised with Human Resources first if possible, should the individual wish to raise the matter of concern, he/she can email or may choose to write a letter directly to:-

Attention : The Managing Director (MD)/Chief Executive Officer (CEO)
BP Plastics Holding Bhd
(Marked “**STRICTLY CONFIDENTIAL AND TO BE OPENED BY ADDRESSEE ONLY**”)

Email to : cylim@bpplas.com

- 15.3 Where reporting to Management is a concern, then the report can be made to the Chairman of the Board:-

Attention : The Chairman
BP Plastics Holding Bhd
(Marked “**STRICTLY CONFIDENTIAL AND TO BE OPENED BY ADDRESSEE ONLY**”)

Email to : khlim@bpplas.com

- 15.4 If the matter is so serious that it cannot be discussed through normal channels of contact with the Chairman or Managing Director, the concern should be reported to the Senior Independent Non-Executive Director without revealing the employee/stakeholder’s identity.

Attention : Senior Independent Non-Executive Director
BP Plastics Holding Bhd
(Marked “**STRICTLY CONFIDENTIAL AND TO BE OPENED BY ADDRESSEE ONLY**”)

Email to : seniorined@bpplas.com

- 15.5 The whistleblowing channels are established to help all stakeholders raise concerns, without fear of retaliation, on any wrongdoing that they may observe in the BPPLAS Group.

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