



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 within the laws of any jurisdiction in which it does business and operates. 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 Malaysia, including Malaysian Anti-Corruption Commission Act 2009 and all amendments made thereto from time to time.
- 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 undertakes 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 individuals 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 considers 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. 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 (Refer Appendix 1).

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 Senior Management is required to establish the procedures or recommend the same to the Board

10. Systematic Review, Monitoring and Enforcement

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

11. Roles and 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 Board and Senior Management are 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 or make a report to the relevant whistleblowing contact person as per the Whistleblowing Policy.
- 11.5 The Board sets the tone that establishes a culture of and commitment to legal compliance and integrity with an effective anti-bribery and anti-corruption framework which require all BPPLAS personnel and stakeholders compliance.
- 11.6 The board's Risk Management Committee would review the company's Anti-Bribery and Anti-Corruption Policy on a regular periodic basis to be approved by the Board accordingly.
- 11.7 The management's Risk Management Committee assist the Board on the execution and implementation of the Anti-Bribery and Anti-Corruption Policy.

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, if any.
- 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 confidentially 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.

- 15.6 The whistleblower may lodge a complaint using the “Whistle-Blower Form” as per Appendix 3.

16. Conducting Due Diligence

- 16.1 . BPPLAS shall conduct due diligence on BPPLAS personnel, business associates, projects and major business activities, in particular where there is significant exposure to bribery and corruption risk.
- 16.2 The methods that can be used for Due Diligence would include deploying survey questionnaires, conducting web searches, reviewing external databases and screening tools/solutions (eg. CTOS). Alternatively, the company may engage third party due diligence service providers if deemed necessary.
- 16.3 The main purpose for conducting the Due Diligence is for BPPLAS to know who we are working with, be it personnel, business associate or any party who is engaged to work for and on behalf of BPPLAS. Based on due diligence results, we may either decline, suspend or terminate relationships with Personnel, business associates or any other parties engaging with BPPLAS to protect BPPLAS from any legal, financial and reputation risk. The due diligence process should be aimed at obtaining sufficient information in order to assess if there are bribery risks posed by these parties.

Policy first published: 29 May 2020
Policy last updated: 21 November 2023

Appendix 1

Gifts and Entertainment Guidelines

Gifts

- a) Any gift must be unsolicited and not affect, or be perceived as affecting, business judgement. Gifts should only be offered to and received in connection with a customary business or cultural occasion. Cash (for celebratory/compassionate purpose eg. marriage, funeral, etc not included), loans, kickbacks or the equivalent advantages are absolutely prohibited.

- b) Gifts **must not exceed RM500** and in any event, must **not occur more than 2 times a year** with the same person. Gifts exceeding the amount of RM500 must be approved by the Managing Director or Financial Controller.
- c) No gift must be given to government officials on BPPLAS behalf.

Entertainment (Hospitality, meals and entertainment)

- a) Hospitality must be unsolicited and not affect, or be perceived as affecting, business judgment. Meals and entertainment should only be offered to and received from the BPPLAS representative dealing with the customer or service provider in their role in BPPLAS, is for purposes supported by BPPLAS and may only be offered in conjunction with legitimate business meetings, conferences or events hosted, supported or sponsored by BPPLAS. They may never be provided on a stand-alone basis.
- b) Hospitality must **not exceed** RM250 per head (for managers and executives) and **RM500** per head (for senior managers and above). Gifts exceeding the amount of RM500 must be approved by the Managing Director or Financial Controller.

Appendix 2

BP PLASTICS GROUP'S EXTERNAL PROVIDERS AND BUSINESS ASSOCIATES
DUE DILIGENCE QUESTIONNAIRE

1.0 COMPLIANCE ON ANTI-BRIBERY AND CORRUPTION POLICY

(Please answer the following regarding your policies and procedures)

- 1.1 Does your Company have an anti-bribery and anti-corruption policy?
- Yes
 No
- 1.2 Does your Company have procedures in place to monitor the effectiveness of its anti-bribery and corruption policy?
- Yes
 No
- 1.3 Does your Company provide training of the anti-bribery and anti-corruption policy to its employees?
- Yes
 No
- 1.4 Does your Company have procedures in place to allow reporting of any misconduct/Whistleblowing Policy?
- Yes
 No
- 1.5 Does your Company allow Facilitation Payments?
- "Facilitation Payment" refer to payment made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.*
- Yes
 No
- 1.6 Does your Company have a code of business conduct and business ethics?
- Yes
 No
- 1.7 Does your Company allow donation to government/political party?
- Yes
 No

**BP PLASTICS GROUP'S EXTERNAL PROVIDERS AND BUSINESS ASSOCIATES
DUE DILIGENCE QUESTIONNAIRE**

If yes, please provide details:

2.0 VIOLATIONS

2.1 Within the last five (5) years, has your Company, or any of your directors, officers, owners, shareholders or employees, ever been found by a court or agency to have violated any anti-bribery laws?

- Yes
- No

If yes, please provide details:

2.2 Within the last five (5) years, has your Company or any of your officers, directors, owners, employees or shareholders ever been investigated or charged with any legal proceeding or lawsuit, including but not limited to offences relating to corruption, bribery, conflicts of interest, Facilitation Payment, or money- laundering?

- Yes
- No

If yes, please provide details:

2.3 Has your Company ever paid money or given anything of value to a public official in order to retain business or obtain an improper advantage in any jurisdiction?

- Yes
- No

**BP PLASTICS GROUP'S EXTERNAL PROVIDERS AND BUSINESS ASSOCIATES
DUE DILIGENCE QUESTIONNAIRE**

If yes, please provide details:

- 2.4 Has your Company ever been suspended or debarred from doing business in any capacity as a result of fraud, misrepresentation, corruption, bribery, money laundering or any other related activities in any jurisdiction?

- Yes
 No

If yes, please provide details:

- 2.5 Has your Company ever made any public disclosures involving fraudulent or corrupt misconduct or improper accounting to any government authority?

- Yes
 No

If yes, please provide details:

- 2.6 Has your Company ever entered into any settlement/paid fine for any offence relating to corruption etc.?

- Yes
 No

If yes, please provide details:

**BP PLASTICS GROUP'S EXTERNAL PROVIDERS AND BUSINESS ASSOCIATES
DUE DILIGENCE QUESTIONNAIRE**

3.0 CONFLICT OF INTEREST DECLARATION

3.1 Do you or the company has any relationship with anyone in BP Plastics Group?

- Yes
- No

If yes, please provide details:

3.2 Do you or the company has any relationship with any government department or government officers?

- Yes
- No

If yes, please provide details:

NOTE: A "conflict" of interest arises in a situation where you are or may be in a position to take advantage of your role by using confidential information, assets or intellectual property for the benefit of yourself or a closely related person. With reference to MACC Act Section 23, a violation happens when a public officer or member of a public or government body uses his position or the office in making a decision or taking action for the interest of himself, his relative, or associate.

On behalf of the company:

Witnessed by:

.....
Name :
NRIC/Passport No. :
Designation :
Date :
Company Name :

.....
Name :
NRIC/Passport No. :
Designation :
Date :
Company Name :

Appendix 3



BP Plastics Holding Bhd.

WHISTLE BLOWER FORM

CONFIDENTIAL

NAME:

ADDRESS :

EMAIL:

HANDPHONE NO:

Preferred method of communication: mail e-mail ~~handphone~~

PARTICULARS OF THE WRONGDOER

NAME(S):

DESIGNATION(IF ANY):

DEPARTMENT(IF ANY):

PARTICULARS OF THE COMPLAINT(*Please submit supporting documents if available./ *Please attach additional sheets if necessary):

DECLARATION

- 1) I declare that that all information provided in this Form is true, correct and complete to the best of my knowledge.
- 2) I hereby agree that the information provided herein to be used and processed for investigation purposes and further agree that the information provided herein may be forwarded to another department / authority / enforcement agency for purposes of investigation.

Signature :

Name:

Date:

Whistleblower Policy and Procedure Guidelines:

- 1) The whistleblowing complaint is to be attention to the appropriate person as described in the Group's Anti-Bribery and Anti-Corruption Policy under section 15.2 to 15.4.
 - 2) The Company may not attend to any anonymous complaint, however the Company may consider investigating an anonymous complaint if it is deemed to be too serious and/or there is a high probability of credibility of the complaint.
 - 3) Upon receiving a whistleblower complaint, a record would be made by the Risk Manager upon notification and the Board would be notified of the complaint received.
 - 4) Upon receiving a whistleblower complaint, a record would be made by the Risk Manager upon notification and the Board would be notified of the complaint received.
 - 5) A preliminary investigation would be conducted by the Internal Auditor and the report made to the Audit Committee. The findings of the preliminary investigation and recommendation shall be referred to the Chairman of the Audit Committee for a decision on whether to close the case or to proceed to a full investigation. If Audit Committee decides the matter is closed, the Risk Manager will inform the Whistleblower that the matter is closed.
 - 6) If the Audit Committee decides that the matter is to be referred to the authorities or will conduct a full investigation, the Risk Manager will inform the Whistleblower that the matter has been referred to the authorities and would require that the Whistleblower to render full cooperation during the conduct of the investigation.
 - 7) The Whistleblower needs to be mindful of the terms in the Whistleblower Protection Act 2010 ("Act 711") which is an "Act to combat corruption and other wrongdoings by encouraging and facilitating disclosures of improper conduct in the public and private sector, to protect persons making those disclosures from detrimental action, to provide for the matters disclosed to be investigated and dealt with and to provide for other matters connected therewith." and be guided accordingly.
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