

Anti-Corruption and Bribery Policy

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WESTPORTS HOLDINGS BERHAD
(Registration No. 199301008024 (262761-A))

Anti-Corruption and Bribery Policy

1. POLICY STATEMENT

- 1.1 **WESTPORTS (hereinafter referred to as “the Group”)** adopts a zero-tolerance policy against all forms of corruption and bribery. We are committed to acting professionally, fairly and with integrity in all our relationships and business dealings and to implementing and enforcing an effective system to counter corruption and bribery. The Group’s Anti-Corruption and Bribery Policy (hereinafter referred to as “the Policy”) is developed and designed to provide detailed process and procedures in line with the applicable laws and regulations in Malaysia. The Policy should thus be read in conjunction with the Group’s various policies & guidelines. If multiple documents speak of the same subject, then the upmost stringent provision prevails.

The Policy intends to fulfil the requirements set forth in:

- The Guidelines on Adequate Procedures issued on 10 December 2018 by the Prime Minister’s Office pursuant to Section 17A (5) of the Malaysian Anti-Corruption Commission Act 2009. (“MACCA”)
- 1.2 The Group shall constantly uphold all laws relating to corruption & bribery in all the jurisdiction where WHB operate. The Group are bound by the laws of Malaysia, in particular the Malaysian Anti-Corruption Commission Act 2009 (“MACCA”), pertaining to our conduct at home.
- 1.3 The Group recognises that acts of corrupt gratification are punishable by way of pecuniary fines and/or jail sentences, as the case may be, upon conviction. If any entity in the Group or person associated with it is found to have taken part in bribery or corrupt activities to benefit the Group, the Group may be subjected to a monetary fine of not less than 10 times the sum or value of the corrupt gratification, and/or the officers concerned jailed not exceeding 20 years, upon conviction under the MACC Act 2009. There may well be other associated charges brought against the Group and/or its officers under other legislations in Malaysia or in the countries in which the alleged offence is committed. All these may lead to serious damage to the Group’s reputation. It is with this in mind that all Personnel shall remain committed to preventing acts of corrupt gratification in the daily conduct of business and undertake the responsibility seriously.

2.0 SCOPE

- 2.1 This policy is intended for Westports Holdings Berhad (“WHB”) and all subsidiary companies within the Group. The Policy is applicable to all the Group’s employees (“Personnel”) including directors. All Personnel (whether temporary, contract basis or permanent) must comply with the Policy, the Group’s other policies and procedures and all applicable laws in the course of employment. Chief Executive Officer (“CEO”), Head of Department (“HODs”), Head of Section (“HOS”) and Managers are responsible to communicate and

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ensure compliance to the policy within their respective department/business functions/units.

- 2.2 The Policy applies to the Group's business associates, which includes but not limited to vendors, contractors, sub-contractors, consultants, trainers, agents, representatives, tenants and other intermediaries who are performing work or services, for and on behalf of the Group. All Personnel, regardless of their position or role, are responsible to communicate the Policy to their business associates. The Policy applies to all parties that are currently engaged with the Group or have intentions to engage with the Group in the future.

3.0 DEFINITION

3.1 Corruption

According to Transparency International, "Corruption" means the abuse of entrusted power for personal gain. It can also be defined as giving or offering a reward to a person in order to influence his conduct. However, corruption has a broader definition than bribery. The Policy, therefore, refers to "Corruption and Bribery" as a standard term to cover all types of gratification.

3.2 Bribery

Under the Malaysian Anti-Corruption Commission Act 2009 ("MACCA"), "gratification" commonly known as "bribery" means offering, giving, receiving or soliciting something of value (for example money or information) in an attempt to illicitly influence the decisions or actions of a person with a position of trust within an organisation.

3.3 Gratification

Defined in the MACCA to mean:

- a) money, donation, gift, loan, fee, reward, valuable security, property or interest in the property being the 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).

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h) The provision or receipt of gratification is not an offence unless it is done corruptly.

3.4 Corporate Liability

3.4.1 Section 17A MACCA, which takes effect from 1 June 2020, provides that “a commercial organisation commits an offence if any person associated with the commercial organisation commits a corrupt act (i.e. gives, agrees to give, promises or offers to any person any gratification) in order to obtain or retain business or advantage for the commercial organisation”.

3.4.2 Whilst a commercial organisation comprises:

- a) a company incorporated under Companies Act 2016 and carries on business in Malaysia or elsewhere;
- b) a company wherever incorporated and carries on business or part of a business in Malaysia; and
- c) a partnership (limited as well as unlimited - local and foreign, with foreign partnerships carrying part of their businesses in Malaysia);;

3.4.3 a person associated with the commercial organisation consists of a Director, a Partner, an Employee, or a person who performs services for or on behalf of the commercial organisation.

3.4.4 S17A (3) provides where an offence has been committed by a commercial organisation, a person who is a Director, Controller, Officer or who is concerned in the management of the commercial organisation’s affairs at the time of the commission of an offence is deemed to have committed that offence. The onus has now shifted to the commercial organisation, its Directors, Partners and Management to demonstrate that they have put in place adequate procedures to deter persons associated with the commercial organisation from committing corrupt acts of gratification.

3.5 Offences and Penalty

There are four (4) main offences prescribed by the MACC Act 2009:

- a) Soliciting or Receiving Gratification (Bribe) as per section 16 & 17(a);
- b) Offering or Giving Gratification (Bribe) as per section 17(b);
- c) Intending to Deceive (False Claim) as per section 18; and
- d) Using Office or Position for Gratification (Bribe) as per section 23.

3.5.1 Engaging in bribery and corruption is illegal according to both local and international legislation. You must be aware that under the MACCA, if you participate in bribery and corruption, you may be subject to:

- a) Imprisonment up to 20 years; and
- b) A fine of not less than ten times the sum or value of the relevant bribe (gratification) or Ringgit Malaysia One (1) Million whichever is higher or a combination of both.

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4.0 DEALING WITH BUSINESS ASSOCIATES

- 4.1 “Business Associate” means an external party with whom the Group has, or plans to establish, some form of business relationship. This may include clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors.
- 4.2 In order to ensure the Group’s operations remain free of corruption and bribery, we are committed to establishing mutually beneficial relationships with business associates, who apply either the same or higher standards of ethics and integrity. This means that we expect all our business associates to adhere to our stance on bribery and corruption. All business associates (including external providers such as consultants, advisors, and agents) of the Group are required to comply with the policy and all other policies as it relates to them.
- 4.3 In circumstances where the Group retains controlling interest, such as in certain joint venture agreements, business associates are required to adhere to the policy. Where the Group does not have a controlling interest, associates are encouraged to comply the same.
- 4.4 Due diligence should also be carried out with regards to any business associates intending to act on the Group’s behalf as an agent or in other representative roles, to ensure that the entity is not likely to commit an act of bribery or corruption in the course of its work with the Group.
- 4.5 The extent of the due diligence should be based on a bribery and corruption risk assessment. Due diligence may include a search through relevant databases, checking for relationships with public officials and self-declaration forms.

5.0 DEALING WITH GOVERNMENT/PUBLIC OFFICIALS

- 5.1 Government official includes a person who works for or is an agent of a government owned or government-controlled entity. This includes elected and appointed officers or employees of national, municipal or local governments (including individuals holding legislative, administrative and judicial positions), officials of political parties and candidates for political offices, employees of government or state controlled companies and Government Linked Companies (GLCs).
- 5.2 All the Group’s Personnel are prohibited from paying for non-business travel, entertainment and hospitality for any public official or his/her family members at any amount without permission from the CEO / Group Managing Director, Chairman or Head of Departments (approved by the CEO).

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5.3 If approval is obtained to provide a gift, entertainment or corporate hospitality to public officials, the Personnel must ensure that the gift, entertainment or corporate hospitality is not excessive and lavish, and must commensurate with the official designation of the public official and not his/her personal capacity.

6.0 CONFLICT OF INTEREST

6.1 A conflict of interest generally arises when one is in a position to take advantage of one's role at the Group for one's personal benefit, including the benefit of one's family/household and friends, by placing one's personal, social, financial or political interests before the interests of the Group. One is expected to avoid conflicts of interest, and situations that have the potential to generate conflicts of interest. Even the appearance of a conflict of interest can be damaging to one or the Group. In particular, the use of the Group office position, confidential information, assets or other resources for personal gain, or for the advantage of others with whom one is related or associated, is prohibited.

6.2 Kindly refer to Code of Conduct Policy for further details on Conflict of Interest which is linked at our website at <http://www.westportsholdings.com/>

7.0 MANAGING GIFTS, HOSPITALITY AND ENTERTAINMENT

7.1 The Group adopts a "No-Gift Policy" whereby all Personnel shall not solicit or accept any gifts from any third party that may have direct or indirect business interest with the Group.

7.2 The Group requires all Personnel to abide by the policy to avoid conflict of interest between the Group and the external parties as a gift can be seen as a bribe that may tarnish the Group's reputation or be in violation of anti-corruption and bribery laws.

7.3 A conflict of interest arises in a situation in which an individual is in a position to take advantage of his or her role in the Group for his or her personal benefit, including the benefit of his or her family and friends. This would undermine the duties of good faith, fidelity, diligence and integrity as expected by the Group from its Personnel in the performance of their duties and obligations.

7.4 Any gift of cash or cash value (e.g. vouchers, coupons, shares, commissions, etc.) is prohibited at all times.

7.5 The exception to the above is for fruits, flowers, and token gifts/ promotional items (such as pens, diaries, umbrellas, t-shirts, etc.) with an approximate actual value of less than Ringgit Malaysia Five Hundred (RM500.00) Only, as well as hampers (reasonable value) which shall be shared amongst team members or placed in common area/ pantry for staff consumption. In such a case, the staff could choose to accept the item and declare the gifts via the Gift Declaration Form.

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7.6 Any gift which violates the terms of “No-Gift Policy” must be declined/returned with an explanation note from the Personnel thanking the third party for the gift but explains politely about the Group’s “No-Gift Policy” and proceeds to decline/return the gift accordingly.

7.7 Receiving Gifts

7.7.1 The Group is very much aware that in certain cultures or situations, gift giving is a central part of business etiquette. Despite acknowledging the Group’s “No-Gift Policy”, some external parties may still insist on providing gifts to the Group’s Personnel and/or their family members.

7.7.2 In the event the Personnel are unable to decline/return a gift with an approximate/actual value exceeding RM500; the Personnel must declare and surrender such gift to Head of Department who in turn will report to Human Resources Department. The CEO / Group Managing Director or Chairman based on their due considerations shall decide the best way to deal with the gift.

7.7.3 The exception to clause 7.7.2 above is for meals provided/ paid for by a third party. In this case, the Personnel could accept any meals provided/ paid by a third party to them which is reasonable in value but must declare it via the Gift Declaration Form in the event it exceeds RM500.

7.7.4 All declarations (with or without any gift, including entertainment and corporate hospitality) must be submitted to the Human Resources Department immediately without delays.

7.7.5 Should any dispute pertaining to this policy arise, the final and decisive interpretation, clarification and decision will be made by the CEO / Group Managing Director or Chairman.

7.8 Receiving Corporate Hospitality & Entertainment

7.8.1 The Group prohibits Personnel from soliciting corporate hospitality and entertainment nor are they allowed to accept hospitality and entertainment that is excessive, inappropriate, illegal or given in response to, in anticipation of, or to influence a favourable business decision, particularly from parties engaged in a tender or competitive bidding exercise.

7.8.2 The Group recognises that the occasional acceptance of an appropriate level of hospitality and entertainment given in the normal course of business is a legitimate norm in building good business relationships. However, it is important for Personnel to exercise proper care and judgement before accepting the hospitality and entertainment. This is not only to safeguard the Group’s reputation, but also to protect the Personnel from allegations of impropriety or undue influence.

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- 7.8.3 Examples of entertainments could include karaoke, golf, movies, spa, concerts orchestra, theatre etc. As for corporate hospitalities, the examples could include conference, dining, open-house, training, event tickets or invitation for events, additional discounts given on items bought from business associate/customer/vendor's companies etc.
- 7.8.4 In the event the Personnel finds that the corporate hospitality is beneficial to foster a healthy business relationship, the Personnel could pursue the same but need to declare to CEO / Group Managing Director, Chairman or Head of Departments (approved by the CEO).
- 7.8.5 For the purpose of the Policy, travelling is defined as corporate hospitality which typically involves travelling cost within the country or overseas paid by the third party.
- 7.8.6 If the Personnel have any doubts on the appropriateness of a corporate hospitality and entertainment offered by an external party, they should either decline the offer or consult with the Human Resources Department.

7.9 Providing Gifts

- 7.9.1 Generally all Personnel are not allowed to provide gifts to third parties with the exception of CEO / Group Managing Director, Chairman and Head of Departments (approved by the CEO) whereby the gift is in the form of the Group's corporate gift mainly as a business courtesy or the gifts are distributed during a corporate event (bearing the Group's name or logo).
- 7.9.2 All expenses incurred to provide the corporate gifts must be properly kept, documented and recorded by the respective department for audit purposes.

7.10 Providing Entertainment

- 7.10.1 The Group recognises that providing modest entertainment is a legitimate way of building business relationships and a common practice within the business environment to foster good business relationships with external clients and other third parties. As such, eligible Personnel are allowed to entertain third parties through a reasonable act of hospitality as part of business networking as well as a measure of goodwill towards the recipients.
- 7.10.2 All Personnel should always bear in mind that this is an area where perception is often regarded as more important than facts and therefore they should always exercise proper care and judgment when providing entertainment to third parties especially when it involves public officials to ensure compliance with local anti-corruption and bribery laws.
- 7.10.3 All Personnel are prohibited from providing or offering to provide entertainment with a view to improperly cause undue influence on any party in exchange for some future benefit or result. Any acts of this nature, whether provided directly

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or indirectly through an intermediary, may be construed as an act of bribery and contrary to the Group's Anti-Corruption and Bribery Policy.

7.10.4 All Personnel are required to comply with the policies and procedures of the Group, and to maintain expenses within the entitlement limits when carrying out entertainment activities. Any potential breach of limit shall obtain CEO / Group Managing Director, Chairman or Head of Departments (approved by the CEO) approval via email (at least three (3) working days prior to the event).

7.10.5 All expenses incurred to provide such entertainments must be properly kept, documented and recorded for audit purposes.

7.11 Providing Corporate Hospitality

7.11.1 The Group recognises that providing corporate hospitality to all stakeholders be it through corporate events, sporting events or other public events, is a legitimate way to network and build goodwill in business relationships.

7.11.2 It is part of the Group's marketing practice to issue complimentary invitations in the form of passes, tickets or invitations to third parties for events organised or sponsored by the Group as well as events organised or sponsored by external organisations.

7.11.3 While providing corporate hospitality reflects the Group's courtesy and goodwill, the Personnel and respective HOD/HOS must exercise proper care to protect the Group's reputation against any allegations of impropriety or the perception of bribery especially when the arrangements could influence or be perceived to influence the outcome of a business decision.

7.11.4 There should also be explicit, clear and internally transparent criteria to determine the selection of guests to be invited to the Group's corporate hospitality event. Reasonable due diligence should be exercised, particularly when the arrangements involve public officials.

7.11.5 All expenses incurred to provide the corporate hospitality must be properly kept, documented and recorded by the respective division/ department for audit purposes.

7.11.6 For corporate hospitality, the respective division/ department/ committee is given an approved budget. Any breach of the approved budget limit shall warrant the respective division/ department/ committee to seek approval from CEO / Group Managing Director, Chairman or Head of Departments (approved by the CEO) via email (at least three (3) working days prior to the event).

7.11.7 Likewise, if the division/ department wishes to provide corporate hospitality which is not under the business plan or budgeted programme, approval shall be sought from CEO / Group Managing Director, Chairman or Head of

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Departments (approved by the CEO) via email (at least three (3) working days prior to the event).

8.0 FACILITATION PAYMENT AND KICKBACKS

- 8.1 Facilitation payment is defined as payments made to secure or expedite the performance by a person performing a routine or administrative duty or function.
- 8.2 Offering, promising or requesting facilitation payments is just as prohibited as actually paying or receiving facilitation payments. Facilitation payments need not involve cash or other financial asset, it can be any sort of advantage with the intention to influence them in their duties.
- 8.3 The Group prohibits accepting or obtaining, either directly or indirectly, facilitation payments from any person for the benefit of the Personnel himself or for any other person. The reason underlying this prohibition is that facilitation payment is seen as a form of bribery and corruption.
- 8.4 All Personnel must not offer, promise, give, request, accept or receive anything which might reasonably be regarded as a facilitation payment. If the Personnel receive a request or offered facilitation payments, he/she must immediately report to the reporting person(s) as provided under the Group's Whistleblowing Policy & Procedures.
- 8.5 The Group does not allow kickbacks to be made or accepted. Kickbacks are typically made in exchange for a business favour or advantage.

9.0 CHARITABLE DONATIONS AND SPONSORSHIPS

- 9.1 Any charitable donations and sponsorship activities conducted must not be used as a conduit to circumvent, avoid, or evade the laws or regulatory requirements. More importantly, it shall not be used to facilitate corruption, illegal and money laundering activities.
- 9.2 All charitable donations and sponsorship requests must be carefully examined for legitimacy and not be made to improperly influence a business outcome.
- 9.3 The proposed recipient must be a legitimate organisation and appropriate due diligence must be conducted in particular to ascertain that the benefits reach their intended recipients whilst the programmes meet the intended objectives.
- 9.4 All charitable donations and sponsorship shall be made in accordance with the approval limits/ budget and must obtain approval from the CEO / Group Managing Director, Chairman or Head of Departments (approved by the CEO).
- 9.5 All Personnel to use good judgment and common sense in assessing the requests. When in doubt, all Personnel should seek further advice from the Human Resources Department.

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9.6 Political Contributions

- 9.6.1 As a matter of general policy, the Group does not make or offer monetary or any kind of political contributions to political parties, political party officials or candidates for political office. The Group recognises this may be perceived as an attempt to gain an improper business advantage.

10.0 EMPLOYEE RESPONSIBILITIES

- 10.1 As an employee of the Group, all Personnel shall read, understand and comply with the information contained within this Policy, and with training or other anti-corruption and bribery information given from time to time.

- 10.2 All Personnel within the Group are equally responsible for the prevention, detection and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this Policy.

- 10.3 All forms of bribery are prohibited, whereby if any Personnel are found to have committed corruption or bribery, they will be subjected to disciplinary action which could result in termination.

- 10.4 All Personnel have the responsibility to prevent and report instances of not only bribery, but also other suspicious activity or wrongdoing which may lead to bribery. If any Personnel suspects or observes anything which is in contravention with the Policy, it may be reported under the 'Whistle-Blower' option at the earliest possible. All reports will be treated as confidential, and the Group will ensure that anyone who reports will not be in detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

11.0 CONDUCTING DUE DILIGENCE

- 11.1 The Group shall conduct due diligence on all Personnel, business associates, projects and major business activities, in particular where there is significant exposure to corruption and bribery risk.

- 11.2 Examples include: Companies Commission of Malaysia documents, anti-corruption and bribery declaration form, deploying survey questionnaires, conducting web searches, reviewing external databases and screening tools / solutions (i.e. CTOS).

- 11.3 It is important for The Group to know the people they are affiliated with, be it Personnel, business associate or any party who is engaged to work for and on behalf of the Group. Based on due diligence results, The Group may either decline, suspend or terminate relationships with Personnel, business associates or any other parties engaging with the Group to protect itself from any legal, financial and reputation risk. The due diligence process should be

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aimed at obtaining sufficient information in order to assess if there are bribery risks posed by these parties.

12.0 TRAINING AND COMMUNICATION

- 12.1 The Group will provide training on this Policy as part of the induction process for all new Personnel. All Personnel will also receive regular, relevant training on how to adhere to this Policy, and will be asked from time to time to formally accept in writing that they will comply with this Policy.
- 12.2 The Group's Anti-Corruption and Bribery Policy and zero tolerance stance shall be clearly communicated to all Personnel during such training.
- 12.3 As good practice, the Group shall provide relevant anti-corruption and bribery training to all Personnel in compliance with the MACC Act 2009 or other requirements (e.g. the Malaysian Code on Corporate Governance, Bursa's Listing Requirements, Companies Act 2016, etc.).

13.0 RECORD KEEPING

- 13.1 The Group shall keep detailed and accurate financial and other records, and shall have appropriate internal controls in place to act as evidence for all payments made. All Personnel shall declare and keep a written record of the amount and reason for gifts, entertainment, hospitality and travel accepted and given, including donations, sponsorships and expenses of similar nature by whatever name called, and understand that such expenses are subject to the Management's review.

14.0 WHISTLE BLOWER POLICY

- 14.1 All Personnel of the Group play an important part in maintaining the highest level of corporate ethics within the Group, and have a professional responsibility to disclose any known malpractices or wrongdoings (hereinafter referred to as "Concerns").
- 14.2 The Whistle Blower policy can be found linked at WHB website at;
<http://www.westportsholdings.com/>

15.0 MONITORING, REVIEWING AND ENFORCEMENT

- 15.1 The Group must diligently monitor these procedures to ensure that they meet the objectives of relevant legislations and remain effective for the Group, and, if necessary, implement changes subject to the approval of the Board of Directors.
- 15.2 Internal control systems and procedures designed to prevent acts of corruption and bribery are subject to regular audits to ensure that they are effective in practice.

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- 15.3 All Personnel are encouraged to offer their feedback on this Policy if they have any suggestions on how it may be improved. Feedback of this nature should be addressed to the Ethics Committee.
- 15.4 This Policy does not form part of a Personnel's contract of employment and the Group may amend it at any time so as to improve its effectiveness at combatting corruption and bribery.
- 15.5 Any Personnel or person associated with the Group, if found guilty of an act of corruption or bribery in breach of this Policy, shall be dealt with according to the Group's disciplinary measures.
- 15.6 This policy will be reviewed annually to assess its effectiveness.

This policy is approved by the Board of Directors on 4 May 2020.