



HARN LEN CORPORATION BHD

200001000001 (502606-H)

ANTI-BRIBERY AND CORRUPTION POLICY

1. INTRODUCTION

- 1.1 This Anti-Bribery and Corruption Policy (“ABC Policy”) has been designed and developed by Harn Len Corporation Bhd (“HLCB”) and implemented by HLCB and its subsidiaries (collectively referred to as “the Group”) to comply with the Malaysian Anti-Corruption Commission Act 2009 (as amended via the Malaysian Anti-Corruption Commission (Amendment) Act 2018) (“MACC Act”) and the requirements set out in the ISO 37001:2016.

2. SCOPE AND APPLICABILITY

- 2.1 This policy is applicable to all directors, officers, employees of the Group (collectively referred to as “HLCB Personnel”) as well as to its business associates (including but not limited to vendors, contractors, sub-contractors, consultants, agents, representatives, tenants and other intermediaries who are performing work or services, for and on behalf of the Group or any part thereof).
- 2.2 All HLCB Personnel and business associates must read, understand, comply and declare their acceptance and compliance with this ABC Policy.
- 2.3 All parties that are engaging with HLCB and/or any of its subsidiaries are also advised to read, understand and comply with this ABC Policy.

3. CORPORATE COMMITMENT

- 3.1 The Group is committed to conducting business dealings with integrity, ethics and transparency.
- 3.2 The Group aims to reinforce good governance to ensure compliance to procedures, codes of conduct and the relevant laws in force to prevent and combat all forms of bribery and corruption in line with the Government’s direction, policies and initiatives.

4. ANTI-BRIBERY AND CORRUPTION POLICY

- 4.1 The Group adopts a zero-tolerance policy against all forms of bribery and corruption.
- 4.2 This encapsulates any action which would be considered as an offence of giving or receiving ‘gratification’ under the MACC Act which defines ‘gratification’ as:-

- (i) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether moveable or immovable, financial benefit, or any other similar advantage;
- (ii) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- (iii) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- (iv) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- (v) any forbearance to demand any money or money's worth or valuable thing;
- (vi) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action 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
- (vii) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (i) to (vi).

Thus, it is an offense under the MACC Act when any person who by himself, or by or in conjunction with any other person corruptly solicits or receives or agrees to receive for himself or for any other person; or corruptly gives, promises or offers to any person whether for the benefit of that person or of another person, any gratification as an inducement to or a reward for, or otherwise on account of any person doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place; or any officer of a public body doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place, in which the public body is concerned.

- 4.3 The Group strictly and expressly prohibits any of its Personnel and/or its business associates and/or parties dealing with any entity within the Group from accepting or obtaining or attempting to accept or obtain, soliciting, offering, promising or giving any bribe or gratification, whether directly or indirectly, as inducement or reward to or from any party to illicitly influence the decisions or actions of a person in a position of trust within an organisation, either for the intended benefit of HLCB or the persons involved in the transaction. However, certain limited forms of hospitality (such as gifts, meals and entertainment) which are offered or accepted without any requisite intention for such an offer or acceptance to be a bribe and which do not run afoul of the MACC Act may be permissible in certain circumstances as outlined in HLCB's Code of Ethics and Conduct.



- 4.4 This ABC Policy applies equally to its business dealings with the private sector and the public sector or Government entities, both domestic and abroad (regardless of regional customs, local practices or competitive conditions) and this includes their directors, personnel, agents and other appointed representatives.
- 4.5 HLCB Personnel are to avoid creating any suspicion or even the appearance of bribery or corruption, in particular when dealing with Government officials.
- 4.6 The Policy is not intended to be exhaustive, and there may be additional obligations that HLCB Personnel are expected to adhere to or comply with when performing their duties and all HLCB Personnel shall always observe and ensure compliance with all applicable laws, rules and regulations to which they are bound to observe in the performance of their duties.
- 4.7 No waivers or exceptions will be granted for practices that deviate from this ABC policy.

5. DUTY TO REPORT

- 5.1 It is the duty of all HLCB Personnel and parties dealing with any entity within the Group to report any gratification given, promised, offered, solicited, obtained or accepted or attempted to obtain or accept to the Malaysian Anti-Corruption Commission (“MACC”) and also to HLCB.
- 5.2 HLCB Personnel and parties making such reports are protected under MACC Act, Witness Protection Act 2010, Whistle Blower Act 2010 and also under this ABC Policy. Any employee who knows of, or suspects, a violation of the Policy, is encouraged to whistle blow or report the concerns through the mechanism set out under HLCB’s Whistle Blowing Policy. The provision, protection and procedure of the Whistle Blowing Policy for reporting of the violations of the Policy are available on HLCB’s website, www.harnlen.com.my.
- 5.3 Under this ABC policy, no individual will be discriminated against or suffer any sort or manner of retaliation for raising genuine concerns or reporting in good faith on violations or suspected violations of the ABC Policy. All reports will be treated confidentially and appropriate action shall be taken against any HLCB Personnel causing such discrimination and/or retaliation and/or reprisal to be made.



6. POLICY VIOLATION

Any official dealing(s) between any entity within the Group with any party found offering, promising, giving or soliciting any bribe or gratification to HLCB Personnel shall be terminated or discontinued and appropriate action shall be taken including but not limited to reporting the incident(s) MACC for investigation.

7. CONSEQUENCES OF VIOLATION/BREACH OF MACC ACT AND ABC POLICY

7.1 Under the MACC Act, participation in bribery and corruption may result in:-

- (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 RM1,000,000.00, whichever is higher (no upper limit).

7.2 Failure to report to MACC is an offence under Section 25 of the MACC Act.

7.3 Violation of any of the ABC Policy's provisions may result in disciplinary action, including termination of employment.

8. POLICY REVIEW AND AMENDMENT

HLCB reserves the right to review, amend or modify this ABC Policy in whole or in part, at any time it deems fit and necessary so to do. However, no such amendment or modification shall be binding on HLCB Personnel, business associates and/or external parties unless the same is notified to them in writing.

9. DECLARATION

All HLCB Personnel shall certify that they have read, understood and will abide by this ABC policy by signing on the declaration attached in the Appendix of this policy. A copy of this declaration shall be documented and retained by the Human Resources Department for the duration of the personnel's employment.



APPENDIX

DECLARATION FORM

I, _____, hereby declare that I have read and understood Harn Len Corporation Bhd's Anti-Bribery and Corruption Policy and shall abide by all the requirements and provisions set out in therein.

Name:
NRIC:
Position:
Date:

Company Stamp/Chop

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