

ANTI-BRIBERY MANAGEMENT SYSTEM

POLICY

As a leading organisation, Malaysian Resources Corporation Berhad ("MRCB") is committed to promote high standards of integrity by conducting our business ethically and in compliance with all applicable laws and regulations in the countries where we do businesses.

We have a zero-tolerance approach against all forms of bribery and corruption. Bribery and corruption in all its forms as where it relates to our activities are prohibited. We have developed an Anti-bribery Management System ("ABMS") based on ISO37001:2016 which sets standards to prevent, detect and respond to bribery.

We undertake the following:

- To prohibit our personnel from receiving or soliciting gifts or any item of value from external parties;
- No employees or external parties will suffer demotion, penalty or other adverse consequences in retaliation for refusing to pay or receive bribes or participate in other illicit behaviour;
- To conduct due diligence checks on prospective personnel and business associates;
- To award contracts and employee positions purely on merit basis;
- All our personnel shall certify in writing that they have read, understood and will abide by this Policy;
- To establish and maintain an anti-bribery and corruption compliance function to oversee the design, implementation, management and improvement of the ABMS;
- To conduct awareness programme for all our personnel on the Group's position regarding anti-bribery and corruption, integrity and ethics;
- To establish and maintain suitable reporting channels for all stakeholders to raise their concerns on any improper conduct and violation of the Policy;
- To take disciplinary action against those personnel who do not comply with the Policy. For external parties, non-compliance may lead to penalties including termination of contract. Further legal action may also be taken in the event that our interests have been affected as a consequence of non-compliance by any individuals and organisations.

IMRAN SALIM
GROUP MANAGING DIRECTOR
DATE: 11th JUNE 2019