



OCR Group Berhad

(Registration No: 199701025005 (440503-K))

(Incorporated in Malaysia)

Anti-Bribery and Corruption Policy

Why do we have this Policy?

OCR Group Berhad (“**OCR Group**”) commits to conducting business ethically in compliance with all applicable anti-bribery and corruption laws.

OCR Group does not condone any form of bribery and corruption. This Anti-Bribery Corruption Policy (“**ABC Policy**”) serves to provide guidance on how to prevent, deal with and combat bribery and corrupt activities and issues that may arise in the course of business.

Who does this Policy apply to?

This ABC Policy applies to all OCR Group’s subsidiaries, employees, directors (executive and non-executive) and any person who performs services for or on behalf of OCR Group, which includes contractors, subcontractors, consultants, suppliers, agents, intermediaries and representatives of any of OCR Group (collectively, “**Applicable Persons**”).

What must you NOT do?

Anti-bribery and corruption laws make it illegal for any person to:

- (a) corruptly give, promise or offer to give to any person, whether for the benefit of that person or of another person; or
- (b) corruptly solicit, receive or agrees to receive for himself or for any other person,

any gratification as an inducement, reward or otherwise on account of any person or any officer of a public body to do or forbear from doing anything in respect of any matter or transaction, actual, proposed or likely to take place.

Accordingly, you shall not at any time:

- Offer, promise or give *anything of value* in order to obtain or retain any personal or business advantage.
- Request or accept *anything of value* that might influence your objectivity in carrying out your employment/business.

“Things of value” that could be perceived as bribery or corruption can take many forms (including monetary, services, donation, employment, discounts or in kind).

The laws on anti-bribery and corruption are very wide and cover activities carried out or merely offered, whether directly or indirectly.

For example, Mr. X is an employee in the Sales Department of one of the OCR Group companies and is charged with an offence for making improper payments to an official. Mr. X will be held liable if:

- *Carried out, offered, promised or agreed.* Mr. X made such improper payments, or merely offered to make such payment even though such payment was subsequently not made; it is enough that the payment was offered.
- *Directly or indirectly.* The improper payment was made by him directly to the official or through a third party agent.

There is no difference whether the bribery or corruption activity is carried out within or from Malaysia, or otherwise.

Code of Conduct

This Policy shall be read in conjunction with the OCR Group's Code of Conduct and Ethics.

What are the penalties?

Engagement in any bribery or corrupt practices or activities will result in severe negative consequences. The Applicable Person may face dismissal, fines and imprisonment up to 20 years.

What else should you do?

All Applicable Persons are responsible for refraining from and preventing any instance of bribery or corruption, and for reporting any concern or suspicion so that OCR Group can identify the risks and conduct investigations as may be necessary. Reports of any concern of suspicion may be made to the Audit Committee Chairman:

Audit Committee Chairman
A-5-1 Block Allamanda
10 Boulevard
Lebuhraya Sprint PJU 6A
47400 Petaling Jaya
Selangor.
Email: juliankoh@ocrbhd.com

If you have any doubt, you should contact the Audit Committee Chairman immediately.

An electronic version of this ABC Policy is available at www.ocrbhd.com.
