



AWC BERHAD
200101014341 (550098-A)

**ANTI-BRIBERY AND
ANTI-CORRUPTION
POLICY**

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1.0 INTRODUCTION

AWC Group has adopted a zero-tolerance policy against all forms of bribery, fraud and corruption.

AWC Berhad (“AWC” or “Company”) and its subsidiaries, collectively referred to as the “(AWC Group)” is committed to conducting business with integrity, a transparent and ethical manner. The AWC Group’s Code of Ethics & Conduct and Employee Code of Conduct set out the Group’s core principles in this regard. The Group Anti-Bribery and Anti-Corruption Policy (hereinafter referred to as the “**Anti-Bribery Policy**”) elaborates upon those principles, provides guidance to all parties stated in section 2 below (“stakeholders”) concerning how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise in the course of business.

This Anti-Bribery Policy is not intended to provide definitive answers to all questions regarding bribery and corruption. Rather, it is intended to provide stakeholders, particularly employees with a basic introduction to how AWC Group combats bribery and corruption in furtherance of the Group’s commitment to lawful and ethical conduct at all times. Please contact the Group Human Resources / Chief Executive Officer’s (“**CEO**”) Office immediately if you need clarifications about the scope of applicable laws or the application of the Group’s policies concerning the fight against bribery and corruption.

Engaging in bribery or corrupt practices can have severe consequences for you and the AWC Group. You may face dismissal, fines and imprisonment, and the company may face damage to reputation, financial loss and disbarment from business and other negative consequences.

This Anti-Bribery Policy is available at www.awc.com.my.

2.0 SCOPE OF APPLICATION

This Anti-Bribery Policy is intended to apply to every director and employee of each of the AWC Group of companies as defined in the AWC Group’s Code of Ethics and Conduct (“**Corporate Code of Ethics and Conduct**”) as annexed herewith. Joint venture companies in which AWC Group is a non-controlling co-venturer and associated companies are encouraged to adopt these or similar principles and standards.

Although this Anti-Bribery Policy is specifically written for AWC Group’s directors and employees, the Group expects that contractors, sub-contractors, suppliers, customers, business associates, consultants, agents, representatives and others performing work or services for or on behalf of or have a direct or indirect business relationship with AWC Group of companies will comply with it where relevant.

If a law conflicts with this Anti-Bribery Policy, you should comply with the law. If you have any questions about any of these conflicts, please consult the Group Human Resources / CEO’s Office.

The above scope of application is not exhaustive.

3.0 DEFINITIONS

For a better understanding of this Anti-Bribery Policy, the following definitions are adopted:

- (a) “AWC Group” or the “Group” is any of the public or private companies within AWC Berhad and / or its subsidiaries.

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- (b) “Director” is a director (executive and non-executive) of the companies within AWC Group, except otherwise stated in this Anti-Bribery Policy.
- (c) “Employee” is any person who is employed by AWC Group, either part-time or full time, or on a contractual basis not limited to executives, non-executives, consultants, secondees and any individuals on direct hire.
- (d) “Family member” includes spouse(s), children (including stepchildren and adopted children), parents, step-parents, siblings, step-siblings, grandparents, grandchildren, in-laws, uncles, aunts, nieces, nephews, and first cousins, as well as any other persons who are members of the household.
- (e) “Business associate” is any third party whether an individual, enterprise, or any form of incorporated legal entity by whatever name who does not have an employment relationship with AWC Group but some degree of involvement in the Group’s business dealings. Business associates provide services to or on behalf of AWC Group and include but not limited to suppliers of production raw materials, appointed distributors, agents, contractors, logistics service providers, information technology or information system vendors, event management companies, external company secretaries, lawyers and consultants.
- (f) “CEO’s Office” refers to Group Chief Executive Officer or Group Executive Director.
- (g) “Public Official” - the definition under the Appendix (v) and (iv) of the Guidelines on Adequate Procedures issued by the Prime Minister’s Department is adopted by AWC Group.

4.0 CONFLICT OF INTEREST

AWC Group expects all directors and employees of the Group to act in accordance with the highest standards of personal and professional integrity in all aspects of their duties and employment. The following policies & guidelines set out the general conduct and behaviour of the directors and employees in respect of Conflict of Interest in discharging their functions & duties:

- (i) Corporate Code of Ethics and Conduct
- (ii) Employee Code of Conduct

5.0 GIFT, ENTERTAINMENT, HOSPITALITY AND TRAVEL

The following policies & guidelines set out the general conduct and behaviour of directors and employees in respect of Gift, Entertainment, Hospitality and Travel in discharging their functions and duties:

- (i) Corporate Code of Ethics and Conduct
- (ii) Employee Code of Conduct

6.0 CORPORATE SOCIAL RESPONSIBILITY, DONATIONS AND SPONSORSHIPS

From time to time, AWC Group takes part in contributing to the well-being of the people and the local communities in the countries where it operates, the Group shall always ensure that all Corporate Social Responsibility (“CSR”) initiatives, donations and sponsorships are made in accordance with AWC Group policies and upon approval by the Group CEO’s Office.

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6.1 CORPORATE SOCIAL RESPONSIBILITY

As part of our commitment to CSR and sustainable development, AWC Group supports CSR initiatives as part of our contribution to the communities and the environment in which we operate in. However, requests for such contribution shall be carefully examined and not to be made to improperly influence a business outcome or secure a business advantage.

The proposed recipient must be a legitimate organisation and appropriate due diligence must be conducted in particular to ascertain whether any Public Officials are affiliated with the organisation.

Any red flags shall be resolved before committing any funds to the programme. Even requests determined to be legitimate shall be carefully structured to ensure that the benefits reach their intended recipients. Please contact the Group’s Human Resources/ Group CEO’s Office for guidance or assistance.

6.2 DONATIONS AND SPONSORSHIPS

All directors and employees must ensure that all donations and sponsorships are not used as a subterfuge for bribery or used to circumvent or avoid any of the provisions of the Corporate Code of Ethics and Conduct, including, in particular, the prohibition on bribery.

In accordance with AWC Group’s commitment to contribute to the community coupled with its values of integrity and transparency, all donations and sponsorships shall be in good faith and in compliance with the Group’s Corporate Code of Ethics and Conduct and this Anti-Bribery Policy. All donations and sponsorships must comply with the following:

- (a) ensure all donations and sponsorships are allowed by applicable laws;
- (b) obtain all the necessary internal authorisation and / or external authorisation, if required;
- (c) be made to well-established entities having an adequate organisational structure to guarantee the proper administration of the funds;
- (d) be accurately stated in the company’s accounting books and records; (e) not to be used as a means to cover up an undue payment or bribery.

For all donations and sponsorships, please refer to the applicable Authority Limits Matrix and Corporate Code of Ethics and Conduct. Please contact the Group’s Human Resources Department if you need further clarification.

7.0 POLITICAL CONTRIBUTIONS

In addition to the Policy & Guidelines set out in the Corporate Code of Ethics and Conduct, as a matter of general policy, AWC Group does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office.

In very limited circumstances, if any contribution is to be made, it must be approved by CEO’s Office, permissible under applicable laws and must not be made with any promise or expectation of favourable treatment in return and must be accurately reflected in the contributor’s accounting books and records.

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8.0 FACILITATION PAYMENT

A facilitation payment is defined as payments made to secure or expedite the performance by a person performing a routine or administrative duty or function. Facilitation payments need not involve cash or other financial assets; it can be any sort of advantage with the intention to influence the other party in his duty.

AWC Group prohibits accepting or obtaining, either directly or indirectly, facilitation payments from any person for the benefit of the employee himself or for any other person who is subject to the Corporate Code of Ethics and Conduct. The reason underlying this prohibition is that facilitation payment is seen as a form of bribery and corruption.

All directors and employees subject to the Corporate Code of Ethics and Conduct must not offer, promise, give, request, accept or receive anything which might reasonably be regarded as a facilitation payment. If you receive such a request or if you are offered facilitation payments, you must report to the Group Human Resources/ CEO’s Office.

An exception to making facilitation payment

However, there are certain situations or circumstances where you are faced with having to make facilitation payments in order to protect your life or liberty. In dangerous situations like this, you are allowed to make payments but you must immediately report to Group Human Resource/ Group CEO’s Office. Making facilitation payment in such a situation is the only exception which can be used as a defence when faced with allegations of bribery and corruption.

9.0 DEALING WITH THIRD PARTIES / BUSINESS ASSOCIATES

AWC Group’s dealings with third parties, which include contractors, suppliers, agents, consultants, joint venture partners, introducers / government intermediaries, Public Officials and other parties, must be carried out in compliance with all relevant laws and consistent with the values and principles of the Corporate Code of Ethics and Conduct. As part of this commitment, all forms of bribery and corruption are unacceptable and will not be tolerated.

AWC Group expects that all third parties acting for or on its behalf to share its values and ethical standards as their actions can implicate the Group legally and tarnish its reputation. Therefore, where we engage third parties, such as contractors, suppliers, agents, intermediaries or joint venture partners, we are obligated to conduct appropriate counterparty due diligence to understand the business and background of any prospective business counterparties before entering into any arrangements with them to ensure that we are dealing with counterparties that subscribe to acceptable standards of integrity in the conduct of their business. The selection consideration and criteria are guided by the Group Procurement Policies with Standard Operating Procedures (“SOP”) established by the respective operating companies.

To help ensure that the businesses conducted with third parties that share AWC Group’s standards of integrity, we shall:

- (a) Conduct due diligence such as background checks on the person or entity, document verification or conducting interviews with the person or entity to be appointed. Do not enter into any business dealings with any third party reasonably suspected of engaging in bribery and improper business practices unless those suspicions are investigated upon and resolved.

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- (b) Ensure all third parties are made aware of AWC Group’s Corporate Code of Ethics and Conduct, this Anti-Bribery Policy and our expectations of them.
- (c) Continue to be aware of and to periodically monitor third party performance and business practices to ensure ongoing compliance.

If at any point during the due diligence exercise or in the dealings with a third party, there are conflicts of interest or “**red flags**” are raised, these warrant further investigation and must be sufficiently addressed before the engagement of the third party can progress.

AWC Group requires its directors and employees to use good judgment and common sense in assessing the integrity and ethical business practices of third parties

Employees should seek advice from the Group Human Resources/ CEO’s Office whenever particular questions arise relating to third parties that the Company has appointed or is considering appointing.

9.1 DEALING WITH CONTRACTORS AND SUPPLIERS

In line with the general principles of the Corporate Code of Ethics and Conduct, AWC Group is committed to upholding the highest standard of ethics and integrity in all aspects of its procurement activities. AWC Group of companies should avoid dealing with any contractors or suppliers known or reasonably suspected of corrupt practices or known or reasonably suspected to pay bribes.

AWC Group of companies must ensure that all procurement activities are in line with their respective procurement policy and procedures, which include:

- (a) Due diligence of contractors and suppliers is undertaken before they are registered / licensed with AWC Group of companies.
- (b) Contractors and suppliers are made aware of and understand the Corporate Code of Ethics and Conduct and this Anti-Bribery Policy and that they will comply accordingly. This is communicated through the AWC Group’s website.
- (c) All commercial contracts with major contractors and suppliers to incorporate a provision whereby AWC Group retains the right to audit third party compliance with the AWC Group’s Corporate Code of Ethics and Conduct and the provisions under this Anti-Bribery policy.

Screening should be conducted on the company, its directors and top management as part of the due diligence process and procedures established in your company. The scope and extent of the due diligence required will vary depending upon the circumstances of each transaction, any red flag identified and the result of the corruption risk assessment process.

AWC Group of companies should also monitor significant contractors and suppliers as part of their regular review of the performance of the third party. AWC Group has the right to terminate their services in the event that these third parties pay bribes or act in a manner which is inconsistent with the AWC Group’s Corporate Code of Ethics and Conduct and this Anti-Bribery Policy.

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If any red flags are raised, these issues must be resolved. If it is not possible then the company must be barred from being on the list of registered or licensed contractors / suppliers and /or disqualified from participating in any AWC Group tender / purchasing activity.

Due Diligence Checklist For Contractors And Suppliers

For all AWC Group of companies, in particular, the procurement function shall follow the following procedures when dealing with contractors and suppliers:

- (a) Perform a risk assessment;
- (b) Undertake due diligence on the third party depending on the result of the risk assessment performed; and
- (c) Preparing and maintaining appropriate written documentation of the due diligence and risk assessment performed.

9.2 JOINT VENTURE PARTNERS

In view of the possibility that AWC Group may be held responsible for the unlawful activities of its co-venturers, we need to ensure that Joint Ventures in which AWC Group has a controlling interest adopt this Anti-Bribery Policy.

Where AWC Group neither controls nor operates the Joint Venture (“JV”) or where AWC Group holds a minority interest, we should:

- (a) make reasonable efforts to influence the JV Partner to adopt this Anti-Bribery Policy (or substantially equivalent standards and principles) and to comply with all applicable anti-bribery and corruption laws and to establish controls substantially similar to AWC Group standards to prevent bribery;
- (b) be alert to warning signs which may arise in the conduct of the business. Any such warning signs must be reported to the Group CEO’s Office and appropriate action to be taken;
- (c) request (or where this right does not formally exist, request) that the majority partner or JV entity to provide written representation of anti-bribery compliance on an annual basis.

9.3 SIGNIFICANT INVESTMENTS, ACQUISITIONS OR MERGERS

AWC Group undertakes due diligence in evaluating investments, acquisitions or mergers to ensure compliance with anti-bribery and corruption laws. The guidelines for companies on undertaking anti-bribery and corruption due diligence in the course of investments, acquisitions or mergers are as follows:

- (a) Anti-bribery due diligence is considered on a proportionate basis for all investments but on a risk-based approach, with the level of due diligence being proportionate to the investments and the perceived likelihood of risk of bribery.
- (b) The level of anti-bribery due diligence for the transaction is commensurate with the bribery risks.
- (c) Anti-bribery due diligence starts sufficiently early in the due diligence process to allow for adequate due diligence to be carried out and for the findings to influence the outcome of the negotiations or stimulate further review if necessary.
- (d) The partners or board provide commitment and oversight to the due diligence reviews.
- (e) The information gained during the anti-bribery due diligence is conveyed efficiently and effectively to the company’s management.

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What To Look For In Anti-Bribery Due Diligence:

- (a) Has bribery taken place historically?
- (b) Is it possible or likely that bribery is currently taking place?
- (c) If so, how widespread is it likely to be?
- (d) What are the commitments of the board and top management of the targeted party to countering bribery?
- (e) Does the targeted party have in place an adequate anti-bribery programme to prevent bribery?
- (f) What would the likely impact be if bribery, historical or current, were discovered after the transaction had completed?

9.4 DEALING WITH AGENTS OR INTERMEDIARIES

AWC Group undertakes due diligence in evaluating the appointment of Agents / Intermediaries to ensure compliance with anti-bribery & corruption laws and the provision of this Anti-Bribery Policy. The guidelines for companies prior to entering into a contract / agreement with the Agents are as follows:

- (a) There is a valid business case for appointing Agents / Intermediaries and the appointment must be approved by the management of the respective operating companies.
- (b) The fees paid to Agents / Intermediaries are reasonable and justifiable in relation to the services rendered.
- (c) Payment will only be paid to the appointed Agent / Intermediaries and not to another third-party organization or individual.
- (d) Agents / Intermediaries are made aware of and understand the Corporate Code of Ethics and Conduct and this Anti-Bribery Policy and that they will comply accordingly.
- (e) AWC Group will have the right to terminate the Agent / Intermediary's agreement if the Agent / Intermediary has acted in a manner inconsistent with the provisions of this Anti-Bribery Policy.

9.5 DEALING WITH PUBLIC OFFICIALS

In general, all directors and employees are to ensure that the Gift, Entertainment, Hospitality and Travel provided to the Public Officials is not excessive, lavish, commensurate with the official designation of the Public Officials and not in his personal capacity.

The following policies & guidelines set out the general conduct and behaviour of directors and employees in respect of Gift, Entertainment, Hospitality and Travel in discharging their functions and duties:

- (i) Corporate Code of Ethics and Conduct
- (ii) Employee Code of Conduct

All directors and employees are prohibited from paying for **non**-business travel and hospitality for any government official or his /her family member / household members without prior approval from the Group CEO's Office.

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10.0 FINANCIAL AND NON-FINANCIAL CONTROLS

AWC Group of companies has already in place the financial and non-financial controls to address various business processes and payments to third parties / business associates. Some of the key controls that must be strictly complied with and enforced are:

10.1 Financial Controls

(a) Limits of Authority (“LOA”)

The authorisation of expenditure and payment is governed by LOA. All LOA will be approved by Group CEO’s Office for implementation and compliance by all operating companies. The authority matrix outlines the decision areas, documents for approval and assigned personnel empowered to authorise & approve the documents with their respective prescribed limits. Segregation of duties is in place whereby the approval process involves different levels and / or departmental functions throughout the key decision areas.

(b) Bank Signatories & Signing Limits

AWC Group has the following key controls:

- (i) All bank accounts to be jointly operated by at least 2 authorised signatories,
- (ii) Different levels of signing limits are assigned to the signatories according to their seniority.

Apart from the above, any request for the opening of a new bank account, the closing of account and revision of authorised signatories / signing limits are subject to the approval by Group CEO’s Office with checks by several Head Office Functions. The bank accounts information is centrally controlled and maintained in the AWC’s Head Office bank signatory system.

(c) Payment for Completed Works / Services / Supplies

Payment can only be made to the contracting party and not any other third party or individual. Proper segregation of duties, verification, authorisation, approval and supporting documents must be in place in the following processes before payment can be made:

- (i) Approved Purchase Order / Agreement / Contracts,
- (ii) Certified work done, services rendered or goods of the right specifications / quality are received by the company,
- (iii) Valid and original invoices from the business associates with quantity and unit price reconciled and matched to (i) and (ii) above via system or manual control.

10.2 Non-Financial Controls

(a) Pre-qualification process

A pre-qualification and approval processes are in place to evaluate the potential third party / business associate in terms of their capacity to undertake the work, company / directors /

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shareholders' background, potential conflicts of interest and the risk / likelihood of their participation in unethical business practices / corruption such as forming a cartel to inflate and fix the prices.

This due diligence should be undertaken prior to entering into a contract with the business associates. The scope and extent of the due diligence required will vary depending on the circumstances/ nature of each transaction, any red flag identified, the result of the risk assessment process and audit issues highlighted by Internal Audit.

(b) Fair competitive process

A fair competitive process is in place where several qualified business associates are invited to compete on price, terms, technical, delivery and quality aspects. A minimum number of pre-qualified business associates invited to quote or tender must be established in order to reduce the risk of corruption or forming a cartel among them. In the event of non-compliance with the policy such as a single source, sole source or less than minimum 3 quotations, exceptional approval by management must be obtained with properly written justifications. Tender Committee has also been established to oversee the procurement and tender process.

AWC Group of companies is also expected to continuously explore and develop other potential sources of supply in the market in order to widen the existing pool of qualified business associates. In addition, the procurement process must also take into consideration the integrity of the tenders / quotations and other price-sensitive information by restricting access to authorised personnel only such as sealed envelope and / or use of tender box under dual lock and key.

(c) Payments to be made to business associates are reasonable and proportionate to the work, services or supplies to be carried out.

Reasonable and proportionate steps are taken (such as via fair competitive process or benchmarking to the market) to ensure that we are not paying unusual or unexplained payment to a business associate which could possibly indicate a corrupt transaction. This is particularly important where there is a risk that the business associate may use part of the payment made to pay a bribe on behalf of or for the benefit of the AWC Group of companies.

11.0 RECRUITMENT OF EMPLOYEES

AWC Group, being a diversified business group, provides equal opportunity for any qualified and competent individual to be employed by the AWC Group of companies from the multicultural and multiracial backgrounds, sourced from externally, locally and internationally.

The recruitment of employees should be based on approved selection criteria to ensure that only the most qualified and suitable individuals are employed. This is crucial to ensure that no element of corruption is involved in the hiring of employees. In line with this, AWC Group may randomly perform more detailed background checks such as criminal, bankruptcy, financial (credit rating) and reference checks when hiring employees for management positions, as they would be tasked with decision-making obligations.

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Employees are encouraged to make self-declaration to the Group Human Resource Department on matters pertaining to conflict of interest, compliance and corruption. Please contact the Human Resources Department if you need further clarification.

12.0 WHISTLEBLOWING POLICY

AWC Group encourages openness and transparency in its commitment to the highest standard of integrity and accountability.

If you make a report or disclosure about any actual or perceived bribery or corruption in good faith, belief, without malicious intent, that a breach or violation as aforesaid may have occurred or may about to occur, you will be accorded the protection of confidentiality, to the extent reasonably practicable, notwithstanding that, after investigation, it is shown that you were mistaken. In addition, employees who whistleblow internally will also be protected against detrimental action for having made the disclosure, to the extent reasonably practicable.

Further details can be found under the following policies:

- (a) Whistleblowing Policy
 - (b) Corporate Code of Ethics and Conduct
 - (c) Employee Code of Conduct
- i. Any alleged or suspected improper conduct must be disclosed using the procedures provided for in the AWC Group Whistleblowing Policy, a copy of which is available from the Group Human Resource Department or AWC Group website at www.awc.com.my. As per the AWC Group Whistle Blowing Policy, any person with a concern or complaint may submit their concern or complaint in writing to the Managing Director/ Group Chief Executive Officer (“MD/CEO”)

By Mail :
 Strictly Confidential
 AWC Berhad
 Attention: The Managing Director/ Group Chief Executive Officer
 20-2, Subang Business Centre, Jalan USJ 9/5T,
 47620 UEP Subang Jaya, Selangor Darul Ehsan

- ii. If for any reason, it is believed that reporting to management is a concern or not possible or appropriate, then the concern should be reported to the Group Internal Auditor of the AWC Group via the following channels:

By Mail :
 Strictly Confidential
 Sterling Business Alignment Consulting Sdn. Bhd.
 Attention: The Chief Internal Auditor

- Unit 95-2, Block H, The Suites, Jaya One,
 72 A, Jalan Universiti, 46200 Petaling Jaya
- Unit 216, Level 2, Lobby 3, Block A Damansara Intan,
 No 1, Jalan SS20/27, 47400 Petaling Jaya

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13.0 RECORD KEEPING

AWC Group of companies must keep financial records with appropriate internal controls in place to substantiate the business reason for making payments to third parties / business associates. All accounts, invoices, documents and records relating to dealings with third parties / business associates must be prepared and maintained with accuracy and completeness. No accounts are to be kept “off-book” to facilitate or conceal improper payments.

All the relevant Standard Operating Procedures shall be properly maintained and regularly reviewed and updated for strict compliance and enforcement. In addition, all records pertaining to the Anti-Bribery Policy / Framework / Programme and Adequate Procedures related discussion, decision and activities must also be properly retained such as minutes of the meeting.

14.0 MANAGING AND IMPROVING ANTI-BRIBERY AND CORRUPTION FRAMEWORK

AWC Group will take continuous steps to review and improve the anti-bribery & corruption programme in order to ensure that the programme is adequate to manage the corruption risks and being implemented effectively. In respect of this Anti-Bribery Policy, it will be reviewed at least once every 3 years or as and when there is any change to the prevailing Laws and Regulations or operating environment of AWC Group.

(a) On-going review and improvement

The Group Risk Management/ Group Human Resource (“GRM/GHR”) Department to monitor and assess on an ongoing basis whether the anti-bribery & corruption programme is:

- (i) adequate to manage effectively the corruption risks faced by AWC Group of companies; and
- (ii) being implemented effectively.

In doing so, the GRM/GHR Department should take into account any weaknesses, deficiencies or recommendations for improvement in the programme which have been identified through Corruption Risk Management, Compliance Risk Assessment Questionnaire (“CRSA”), reports from Internal Audit / other Departments and the Board review. The GRM/GHR will provide a written report at regular intervals to the Board on the adequacy and implementation of the anti-bribery and corruption programmes.

(b) Periodic audit

The GRM/GHR’s on-going review will be assisted by Internal Audit. Both functions will liaise with each other so as to ensure that their action plans are the complementary and wider scope of coverage particularly on areas of high corruption risk.

(c) Board review

The Board will:

- (i) regularly review the GRM/GHR report, Internal Audit report, Enterprise Risk Management report and other relevant reports related to corruption risks.
- (ii) ensure that appropriate actions are taken to:
 - rectify any weaknesses or deficiencies identified,
 - implement appropriate improvements to the programme.

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15.0 COMMUNICATION AND TRAINING

Communication of Anti-Bribery Policy and Programmes

The Group CEO's Office shall issue a written statement to all directors and employees confirming the Board's commitment to the Anti-Bribery Policy and programmes. This statement and the Anti-Bribery Policy shall be communicated to all directors and employees and be published on the AWC Group's website. All directors and employees are also required to sign a document that they have received, read and understood the Anti-Bribery Policy and shall comply with it.

The communication of this Anti-Bribery Policy and programmes to all stakeholders can be conducted in a variety of formats and mediums. These may include, but are not limited to:

- (i) messages on the Group's intranet or website;
- (ii) emails, newsletters, posters;
- (iii) code of conduct and employee's handbooks;
- (iv) seminars or messages;
- (v) town-hall sessions.

Training

AWC Group of companies will provide appropriate anti-corruption training on a regular basis to all relevant employees to make them aware of the types of corruption they could encounter, the risks of engaging in corrupt activities, the Anti-Bribery Policy and procedures and the reporting channel. The training can be conducted in a variety of formats, which may include but not limited to:

- (i) induction programmes for new recruits featuring anti-corruption elements;
- (ii) refresher trainings / briefings for existing employees;
- (iii) corporate training programmes, seminars, videos and in-house courses;
- (iv) intranet or web-based learning programmes.

CODE OF ETHICS AND CONDUCT

All Directors and employees of the Group in exercising and/or discharging their powers or duties shall comply with all applicable laws, rules and regulations including the constitution of the Group. The core areas of conduct include the following: -

- i. Compliance at all times with the Code of Ethics and Conduct and the Board Charter.
- ii. Observe high standards of corporate governance at all times.
- iii. Observe high standards of business, professional and ethical conduct, and to refrain themselves from offering, giving or receiving any gifts and any other form of benefits (in kind, cash, advantages and/or favour and etc) from persons or entities who deal with the Company where the gift would reasonably be expected to influence the performance of their duties in any aspect.
- iv. Adhere to the principles of selflessness, integrity, objectivity, accountability, openness, honesty and leadership, including fair dealing and the ethical handling of conflicts of interest.
- v. Not misuse information gained in the course of duties for personal gain or for political purposes.
- vi. Uphold accountability and act in good faith and in the best interests of the Company and the Group.
- vii. Ensure the protection of the Company's legitimate business interests, including corporate opportunities, assets and confidential information.
- viii. Ensure full, fair, accurate, timely and understandable disclosure.
- viii. Declaration of any personal, professional or business interests that may conflict with responsibilities.

In the event of any violation of this Code of Ethics and Conduct by any Director or employees of the Group, the Board of Directors of the Company shall determine appropriate actions to be taken after considering all relevant information and circumstances.

The Board of Directors of the Company will review this Code of Ethics and Conduct from time to time to ensure that it continues to remain relevant and appropriate.