

# ANTI-BRIBERY AND CORRUPTION POLICY

## 1. Introduction

- This Anti-Bribery and Corruption Policy ("Policy") is part of LTKM's commitment in conducting its business in a legal and ethical manner that complies with all applicable laws, which include the Malaysian Anti-Corruption Commission Act 2009 and the Malaysian Anti-Corruption Commission (Amendment) Act 2018 and any of its amendments or reenactments that may be made by the relevant authority from time to time.
- LTKM takes reasonable measures and implement appropriate procedures to prevent involvement of bribery and corruption in its business practices.
- This Policy is not meant to be exhaustive and should be read together with LTKM's Code of Conduct & Ethics, Whistle Blower Policy and Procedures and other applicable policies and procedures.
- Unless otherwise stated, any references to "we", "us", "our", "LTKM", "Group" and "Company" in this Policy refers to LTKM Berhad and all its subsidiaries.

## 2. Objectives

- This Policy is intended to:
  - Set out LTKM's principles on bribery and corruption
  - Provide guidance on how to handle situations that could involve bribery and corrupt practices.

## 3. Scope & Applicability

- This Policy is applicable to :
  - Directors and employees of the Group; including those on part-time, contract, in probation or temporary basis ( " Employees " ).
  - Business associates of the Group; these are parties who carry out works for and/or on behalf of any companies within the Group including provision of goods and services. They include such as suppliers, contractors, sub-contractors, agents, consultants, advisors, customers, partners, distributors, solicitors, representatives and others ("Associates").
- This Policy forms an integral part of the terms and conditions of the employment and business contracts; as the case may be.

- In the event of conflict between mandatory law and this Policy, the law shall prevail.

#### 4. Bribery and Corruption

- Bribery is the offering, giving, receiving or soliciting of any item of value to influence the actions of an official, or other person to gain advantage or benefit whether commercial, contractual, regulatory or personal.
- Bribery also includes an illegal or unethical gift or lobbying effort bestowed to influence the recipient's conduct. It may take the form of money, goods, rights in action, property, preferment, privilege, emolument, objects of value, advantage, or merely a promise to induce or influence the action, vote, or influence of the recipient.
- Corruption is a form of dishonesty or abuse of power undertaken by a person or organization entrusted with a position of authority, to acquire commercial, contractual, regulatory or personal advantage or benefit. Corruption may include offering, giving, receiving, or soliciting of bribery.

#### 5. Gifts and Hospitality

- Employees and associates are not allowed to promise, offer or give any gifts or hospitality in any form, in order to secure improper business advantage or to improperly influence business decisions whether to private or public officials and entities.
- Employees and associates are also not allowed to require, solicit or accept any gifts and hospitality in any form for their own personal benefit or benefit of the Company.
- However, gifts and hospitality which are customary or festive in nature are allowed based on the following :
  - Must not be lavish and excessive in value compared to the occasion
  - Will not result in undue influence or create obligation on the part of the recipient
  - Not exclusively available to the particular recipient only
  - Documented and recorded properly including details such as recipients, purpose, approval and value.
  - Legal and compliant with relevant laws
- Employees and associates must politely decline any offer of gifts or hospitality that are not allowed and explain our Policy to the third party.

- Employees and associates must declare and surrender ( for gifts ) any gifts or hospitality that cannot be avoided immediately to upper management in accordance with procedures. The management will make a decision to donate, return or give away the gift as appropriate.

## 6. Donations & Sponsorships

- Donations and sponsorships for the purpose of corporate social responsibility and charity are allowed, subject to prior approval from upper management.
- Whilst LTKM supports corporate social activities especially to the under-privileged, employees and associates must be careful to ensure that all donations and sponsorship are for legitimate purpose and not used to disguise any forms of bribery and corruption.
- The recipients of such donations and sponsorship must be registered official entity and records of receipt properly surrendered to the Integrity Officer to be kept in the Company and be audited as necessary.

## 7. Associates' Roles and Responsibilities

- LTKM's Associates must always abide by the Policy in all their business dealings that are carried out for LTKM.
- LTKM's Associates are not allowed to offer, promise, solicit, give or accept bribes, in any forms, on behalf of LTKM and for all jobs related to LTKM.
- This Policy also applies to LTKM's Associates' suppliers, contractors, sub-contractors, agents, consultants, distributors, solicitors, representatives and others who are engaged by the Associates to carry out jobs and services for LTKM.
- This Policy is explained to Associates for their compliance and forms a part of the terms and conditions of engagement / contracts with them. Where appropriate, the terms and conditions of contracts will contain clause(s) pertaining to compliance of the Policy.
- Associates may liaise with LTKM or our Integrity Officer in case of doubt and for any clarification. Strict actions may be taken on Associates who breach this Policy, including but not limited to termination of contract.

## 8. Employees' Roles and Responsibilities

- Compliance with the Policy together with the Company's Code of Conduct & Ethics, Whistle Blower Policy and Procedures and other policies and procedures, forms an integral part of the Employee's terms of engagement
- Employees who suspects or knows of a violation of the Policy has a duty to report by following the procedures of reporting as outlined in LTKM's Whistle Blower Policy and Procedures. The Company's Whistle Blower Policy and Procedures is available to all employees. A copy of the policy is also available in LTKM's official website.
- Awareness of this Policy is part of employee training for all existing and new employees as well as training on regular basis.
- Breach of the Policy may lead to disciplinary action including but not limited to termination of employment.

## 9. Documentation and Record Keeping

- Accurate and complete records must be properly stored and maintained as part of the usual course of business administration. These records also serve as evidence that payments made were bona-fide and not linked to bribery and corruption.

## 10. Review and Monitoring

- This Policy is subject to regular review, improvement and updates from time to time.
- Review for compliance of the Policy is embedded into day-to-day operational procedures. It is also subject to regular auditing by the Group's Internal Auditor for testing of effectiveness and consistent compliance.
- This Policy is dated 31 May 2020.

## 11. Integrity Helpdesk

- If you require any clarifications on the Policy or have any queries where you are unsure about matters related to bribery and corruption, you may contact:
  - Integrity Officer : Ker Tze Hwee
  - Email : tze-hwee.ker@ltk.com.my
  - Telephone : 03-33422830