



BINTULU PORT HOLDINGS BERHAD
(Company No: 199601008454(380802-T))

ANTI- BRIBERY AND CORRUPTION POLICY

BINTULU PORT HOLDINGS BERHAD GROUP

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1.0 **OBJECTIVE**

- 1.1 The objective of this **Anti-Bribery and Corruption Policy** (hereinafter referred to as the “**ABC Policy**”) is to serve as a guideline to Bintulu Port Holdings Berhad Group (hereinafter referred to as “**BPHB Group**”) to deal with gratification by way of improper solicitation, bribery and other corrupt activities, receiving and providing gifts, giving and receiving entertainment, corporate hospitality, political contributions, corporate social responsibility, sponsorships, donations and matters that may arise in the course of its business.
- 1.2 This ABC Policy is not intended to provide definitive answers to all questions on corruption and bribery but rather to provide the basic introduction as to how BPHB Group deals and combats corruption issues and bribery.
- 1.3 This ABC Policy is applicable to all directors, senior management, officers and employees of BPHB Group except as otherwise stated in this ABC Policy. All associated persons such as contractors, subcontractors, consultants, agents, representatives who are performing works and services for or on behalf of BPHB Group and any other third parties who may come into contact in the course of doing business with BPHB Group are required to comply with this ABC Policy in its relevant part when performing such works or services.
- 1.4 Engaging in corrupt practices or bribery can have severe consequences for all parties be it the BPHB Group, its employees, associated persons and any third parties. Employees may face disciplinary action which amounting to dismissal and legal action, associated persons and third parties may face legal proceedings which lead to fines and sentence to imprisonment whilst BPHB Group may face serious damage to its reputation in the public market worldwide, financial losses, and disbarment from business as well as other negative consequences.
- 1.5 This ABC Policy will supersede any other existing policies (if any) relating to corruption and bribery. If this Policy conflict with any laws on corruption and bribery that are enforceable, the said law shall prevail and one shall comply with the said law.
- 1.6 The officer responsible for this ABC Policy is the Integrity Officer (IO) of BPHB Group.

2.0 **POLICY STATEMENT**

- 2.1 It is the BPHB Group’s policy to conduct all of its business in an honest and ethical manner with transparency, accountability and integrity in line with the **Malaysian Anti-Corruption Commission (MACC) Act 2009** and the **Malaysian Anti-Corruption Commission (Amendment) Act 2018** as well as the **National Anti-Corruption Plan (NACP)** which reflects the people’s expectations for a greater corrupt-free nation that promotes transparency, accountability and integrity culture in every Malaysians.
- 2.2 The BPHB Group adopt **zero-tolerance approach** to all forms of corruption and bribery and is committed to acting professionally and fairly in all of its business dealings and relationships. BPHB Group will avoid acts which might adversely affect the integrity and reputation of the BPHB Group.
- 2.3 This ABC Policy is applicable to every director, senior management, officers and employees of the BPHB Group, associated persons as well as third parties having business contact and dealings with the BPHB Group pursuant to **Section 17A (6) of the MACC Act 2009**.

- 2.4 It provides the employees with information and guidance on how to recognize, deal and combats corruption in furtherance to BPHB Group's commitment to lawful and ethical behaviours at all times.
- 2.5 The ABC Policy is set out to protect BPHB Group against the possible penalties, fines and repercussions resulting from acts of corruption and bribery or being associated with such behaviour that will damage and tarnish reputation of the BPHB Group.

3.0 **DEFINITION**

Associated Person means any person or any organisation or cooperation who is associated with any directors, employees of the Company or who holds shares of capital stock, partnership interests in the Company or who perform works or services for or on behalf of the Company;

BPHB Group refers to Bintulu Port Holdings Berhad and its subsidiaries ie. Bintulu Port Sdn. Bhd., Biport Bulkers Sdn. Bhd. and Samalaju Industrial Port Sdn. Bhd.;

Company means Bintulu Port Holdings Berhad;

Director means any person occupying the position of director of a corporation by whatever name called and includes a person in accordance with whose directors or instructions the majority of directors of a corporation are accustomed to act and an alternate or substitute director.

Employee means any person, irrespective of his occupation, who has entered into a contract of service with BPHB Group.

Family members mean husband or wife/wives, father, mother, brother, sister, grandfather, grandmother, father and mother in-law and legitimate children of the Employee. Children shall also include stepchildren and legitimate adopted children.

Gratification as per Section 3 MACC Act 2009 means:-

- (a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
- (b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- (c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- (d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- (e) any forbearance to demand any money or money's worth or valuable thing;
- (f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or 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

- (g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f);

Integrity Officer means a person appointed by BPHB Group to coordinate and monitor BPHB Group's compliance to ABC Policy and other statutory regulations including direction/regulations of BPHB Group relating to corruption and bribery, implement recovery programme as well as advising BPHB Group's Management including Board of Directors on any matters relating to any breach or act which may tantamount to breach of the ABC Policy and/or any statute relating to bribery and/or corrupt practices.

Public Official means any person holding, acting in or exercising the functions of a public office.

Third Party(ies) means any individual or organization that an employee or associates can come into contact during the course of his/her work or engagement for or with BPHB Group including but not limited to, the existing or potential customers, suppliers, consultants, agents and its representatives, contractors, external companies and any other stakeholders with whom a business relationship, whether current, prospective or historic exists.

4.0 WHAT IS BRIBERY?

- 4.1 Bribery is the common form of corruption and can be broadly defined as the offering, promising, giving, accepting or soliciting of an advantage as an inducement or reward for an action which is illegal or a breach of trust. An inducement is something which helps to bring about an action or desired result;
- 4.2 Bribery takes place if someone is given a gift, donation, loan, cash or non-cash incentive, benefit, or is taken out for particularly lavish hospitality and that in doing so, the giver of such items has done so with the intention of inducing or rewarding someone to behave improperly or not to perform their function correctly or in good faith;
- 4.3 Bribery and corrupt practices can be direct (e.g. an employee give or receive bribes from a third party or public official) or indirect (e.g. an employee get someone else to give or receive bribes from third party);
- 4.4 Facilitation payments and kickbacks can also be seen as another form of bribery and corruption. Facilitation payments can be defined as payments made to secure or expedite the performance by a person performing a routine or administrative duty or function. Meanwhile, kickbacks are typically payments made in return for a business favour or advantage and can include discounts or other types of cash incentives. The BPHB Group does not make facilitation payments or kickbacks of any kind.

5.0 ANTI-BRIBERY AND CORRUPTION STANDARDS

- 5.1 For the purpose of the ABC Policy, it is prohibited for the directors and employees as well as associated person of the BPHB Group to:-
- (a) give, promise to give, or offer a payment, gift or hospitality to a third party or otherwise engage in or permit a bribery offence to occur, with the expectation or hope that an advantage in business will be received, or to reward a business advantage already given;

- (b) give, promise to give, or offer a payment, gift or hospitality to a third party to facilitate or expedite a routine procedure;
- (c) accept a payment, gift or hospitality from a third party that is known or suspect that it is offered or provided with an expectation that a business advantage will be provided by the Company in return;
- (d) threaten or retaliate against another employee or worker who has refused to commit a bribery offence or who has raised concerns under this ABC Policy or BPHB Group's Whistle Blowing Policy;
- (e) induce another individual or associates to indulge in any of the acts prohibited in this ABC Policy;
- (f) give or accept any gift where such gift is or could reasonably be perceived to be in contravention of this ABC Policy and / or applicable laws; or
- (g) engage in any activity that might lead to a breach of this ABC Policy.

5.2 Non-compliance with this ABC Policy may result in criminal or civil penalties which will vary according to offence. An employee acting in contravention of this ABC Policy will face disciplinary action including dismissal.

6.0 NO GIFT POLICY

6.1 BPHB Group shall include and adopt in this ABC Policy, the “**No Gift Policy**”. BPHB Group's directors, senior management, employees and family members or associated persons or any person who performs services for or on behalf of BPHB Group is prohibited from directly or indirectly receiving or providing gifts.

6.2 BPHB Group requires its directors and employees to be abided by this ABC Policy and to avoid any conflict of interest or the appearance of conflict of interest for either party in an on-going or potential business dealing between BPHB Group and third parties. Gift can be seen as a bribe that may tarnish BPHB Group's reputation or be in violation of this ABC Policy and the Malaysian Anti-Corruption Commission (MACC) Act 2009 and the Malaysian Anti-Corruption Commission (Amendment) Act 2018.

6.3 A conflict of interest arises in a situation in which an individual is in a position to take advantage of his or her role in the BPHB Group for his or her personal benefit, including the benefit of his or her family members and friends. This would undermine the duties of good faith, fidelity, diligence and integrity as expected by the BPHB Group from its directors and employees in the performance of their duties and obligations.

6.4 It is the responsibility of each directors and employees to inform the third parties who are involve in any business dealings with BPHB Group of this “No Gift Policy” and to request the third parties' understanding and adherence with this ABC Policy.

6.5 Receiving Gifts

- (a) BPHB Group is very much aware that the exchange of gifts can be a very delicate matter where, in certain cultures or situations, gift giving is a central part of business etiquette. Despite acknowledging BPHB Group's “No Gift Policy”, some third parties may still insist in providing gifts to BPHB Group's directors, employees and/or their family members in certain situations which do not fall within the general exceptions.

- (b) Although the general principle is to immediately refuse or return such gifts but accepting a gift on behalf of the BPHB Group is allowed only in very limited circumstances, whereby when refusing such gift is likely to seriously offend and may severe BPHB Group's business relationship with the third parties. In this situation, the gift must be politely returned with a note of explanation about BPHB Group's "No Gift Policy".
- (c) The test to be applied is whether in all the circumstances the gift is reasonable and justifiable rather than lavish and extraordinary, bearing in mind that what may normally be viewed as small or insignificant in some countries can be of significant value to another. The intention behind the gift should always be considered and nothing should be specifically expected or demanded in return.
- (d) All employees of BPHB Group are expected to immediately record the acceptance of gift in the **Gift Activity Reporting Form (GARF)** for submission to Head of Division/Department who will then decide whether to approve the acceptance of the gift or require it to be returned. The GARF is attached herewith as **Appendix I**.
- (e) All Directors when faced with this situation of accepting gift from third parties are required to inform the Company Secretary as soon as reasonably practicable to seek advice and for further action.
- (f) In any event of conflict of interest, the Head of Division/Department must not approve the acceptance of such gift and must politely return such gift with a note of explanation about BPHB Group's No Gift Policy.
- (g) The Head of Division/Department may approve the acceptance of the said gift but must determine the treatment of the gift whether to:-
 - i. Donate the gift to charity; or
 - ii. Hold it for display in the Division/Department; or
 - iii. Share it with other employees in the Division/Department; or
 - iv. Permit it to be retained by the employee.

In doing so, the Head of Division/Department is expected to exercise due care and proper judgment taking into account pertinent circumstance including the character of the gift, its purpose, the position/seniority of the person providing the gift, the business context, reciprocity, applicable laws and cultural norms.

6.6 **Providing Gifts**

Generally employees are not allowed to provide gifts to third parties with the exception of the Group Chief Executive Officer (CEO), Chief Operating Officer (COO) and any other officers as approved by the BPHB Group.

6.7 **Exceptions to the No Gift Policy**

- (a) Although generally BPHB Group practices a "No Gift Policy," there are certain exceptions to the general rule whereby the receiving and provision of gifts are permitted in the following situations:
 - i. Exchange of gifts at the company-to-company level (e.g. gifts exchanged between companies as part of an official company's visit/courtesy call and thereafter the said gift is treated as Company's property); or

- ii. Gifts from BPHB Group to external institutions or individuals in relation to BPHB Group's official functions, events and celebrations (e.g. commemorative gifts or door gifts offered to all guests attending the event); or
 - iii. Gifts from BPHB Group to its directors and/or employees and/or their family members in relation to an internal or externally recognised company's function, event and celebration (e.g. in recognition of director's/employee's service to the company); or
 - iv. Token gifts of nominal value normally bearing BPHB Group's logo (e.g. t-shirts, pens, diaries, calendars and other small promotional items) that are given out equally to members of the public, delegates, customers, partners and key stakeholders attending events such as conferences, exhibitions, training, trade shows etc. and deemed as part of the BPHB Group's brand building or promotional activities; and
 - v. Gifts to third parties who have no business dealings with BPHB Group (e.g. monetary gifts or gifts in-kind to charitable organisations).
- (b) Even in the above exceptional circumstances, directors and employees are expected to:
- i. Exercise proper care and judgment in handling gift activities;
 - ii. Conscientiously maintain highest degree of integrity;
 - iii. Avoid any conflict of interest;
 - iv. Refrain from taking advantage of position or exercising authority to further own personal interest at the expense of BPHB Group; and
 - v. Comply with all applicable laws, rules, regulations and BPHB Group's policies and procedures;
- (c) The giving of gifts is not prohibited if the following requirements are met:
- i. Not done with the intention of influencing a third party to obtain or retain business or a business advantage or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
 - ii. Complies with relevant laws enforceable;
 - iii. Not a cash or a cash equivalent such as vouchers, discounts, coupons, commissions, shares, etc;
 - iv. Taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;and
 - v. Given openly, not secretly;

7.0 ENTERTAINMENT

7.1 BPHB Group recognises that providing and receiving modest entertainment is a legitimate way of building business relationships and a common practice within the business environment to foster good business relationship with external clients. As such, eligible employees are allowed to entertain external clients through a reasonable act of hospitality as part of business networking as well as a measure of goodwill towards the recipients.

7.2 Receiving Entertainment

- (a) BPHB Group recognises that the occasional acceptance of a reasonable and modest level of entertainment provided by third parties in the normal course of business is a legitimate way to network and build good business relationships.
- (b) However, it is important for directors and employees to exercise due care and proper judgment before accepting entertainment offered or provided by a third party. This is not only to safeguard BPHB Group's reputation, but also to protect directors and employees from allegations of impropriety or undue influence.

7.3 Providing Entertainment

- (a) Directors and employees should always exercise proper care and judgment when providing entertainment to third parties especially when it involves public officials to ensure compliance with the Malaysian anti-bribery and corruption laws.
- (b) Directors and employees are strictly prohibited from providing or offering to provide entertainment with a view to improperly cause undue influence on any party in exchange for some future benefit or result. Any acts of this nature, whether provided directly or indirectly through an intermediary, may be construed as an act of bribery and corruption.

8.0 CORPORATE HOSPITALITY

8.1 Corporate hospitality is generally defined as "corporate events or activities organised by an organisation which involves the entertainment of employees and third parties for the benefit of that organisation".

8.2 Corporate events and activities include but are not limited to sporting events, gala dinners, concerts or activity based events.

8.3 Corporate hospitality is recognised as a legitimate way to network and build goodwill in business relationships. However, there is a fine line between what is considered to be legitimate against illegitimate forms of corporate hospitality. The question is whether there is any intention to influence or be perceived to influence the improper outcome of a business decision by providing the corporate hospitality.

8.4 Corporate hospitality would be illegitimate in the following situations:-

- (a) If it provides an advantage to another person if offered; or
- (b) If it is given with the intention of inducing the person to perform a relevant function improperly; or
- (c) If there is knowledge that acceptance of the advantage would in itself be improper performance.

8.5 Corporate hospitality arrangements/activities should conform to the following basic principles:

- (a) Transparency, in that all corporate hospitality is reported and written approval is obtained, all records of which are properly kept;
- (b) Proportionality i.e. the corporate hospitality must not be too excessive. In addition, the corporate hospitality must commensurate with the recipient's official capacity and not provided in his/her personal capacity;
- (c) Reasonableness in ensuring that the corporate hospitality is not lavish; and
- (d) Bona fide, where the intention to offer and/or provide the corporate hospitality is done with good and legal intention.

8.6 **Receiving Corporate Hospitality**

- (a) As a general principle, BPHB Group strictly prohibits directors and employees from soliciting corporate hospitality nor are they allowed to accept hospitality that is excessive, inappropriate, illegal or given in response to, in anticipation of, or to influence a favourable business decision for example, from parties engaged in the procurement process i.e. in a tender or competitive bidding exercise.
- (b) Notwithstanding the above, BPHB Group recognises that the occasional acceptance of an appropriate level of hospitality given in the normal course of business is usually a legitimate contribution to building good business relationships. However, it is important for directors and employees to exercise due care and proper judgement before accepting the hospitality. This is not only to safeguard the BPHB Group's reputation, but also to protect directors and employees from allegations of impropriety or undue influence.

8.7 **Providing Corporate Hospitality**

- (a) BPHB Group recognises that providing corporate hospitality to its stakeholders be it through corporate events, sporting events or other public events, is a legitimate way to network and build goodwill in business relationships.
- (b) While providing corporate hospitality is a reflection of BPHB Group's courtesy and goodwill, every employee must exercise proper care and reasonable due diligence, particularly when the arrangements involve public officials. This is to protect the BPHB Group's reputation against any allegations of impropriety or the perception of bribery especially when the arrangements could influence or be perceived to influence the outcome of a business decision and are not reasonable and bona fide expenditures.
- (c) All expenses incurred to provide the corporate hospitality must be properly documented, receipted and recorded in the BPHB Group of Companies' records.

9.0 **GIFT, ENTERTAINMENT AND CORPORATE HOSPITALITY THAT ARE NOT PERMISSIBLE**

9.1 Directors and employees of BPHB Group are required to decline any offers of gift, entertainment or corporate hospitality that are not permissible as follows:

- (a) When offered by parties engaged in BPHB Group's tender or competitive bidding exercise;
- (b) When comes with a direct or indirect suggestion, hint, understanding or implication that in return, a desired or expected outcome is required ("quid pro quo");
- (c) Illegal or in breach of the laws enforceable;
- (d) Lavish, extravagant or excessive or may adversely affect BPHB Group's reputation;
- (e) Sexually oriented or may otherwise tarnish BPHB Group's reputation.

9.2 In the event of doubts on the appropriateness of accepting a gift, entertainment or corporate hospitality offered by third parties, employees are required to either decline the offer or consult the Head of Division/Department or the IO. For directors, to consult and seek advice from the Company Secretary.

10.0 POLITICAL CONTRIBUTION

BPHB Group does not make any contributions or donations whether in the form of monetary or in kind to political parties, political party officials or candidates for political office except in accordance with the laws and with the written authorisation of the Group Chief Executive Officer. Directors and employees shall be deemed to be acting in their own personal capacity and not on behalf of the BPHB Group in the event that they had contributed to any political parties or candidates without any appropriate authorisation or approval.

11.0 CORPORATE SOCIAL RESPONSIBILITY (CSR), SPONSORSHIPS AND DONATIONS

The BPHB Group, being a responsible corporate citizen, is committed to cultivate a strong relationship with the local communities by contributing to the well-being of the people and nation. However, it is important that all CSR, sponsorships and donations are made in accordance with the BPHB Group policies and duly approved by the Group Chief Executive Officer or the Board of Directors where applicable.

12.0 DEALING WITH PUBLIC OFFICIALS

12.1 Directors and employees of BPHB Group must exercise caution when dealing with public officials including foreign public officials. BPHB Group does not make any contributions to public officials except in accordance with the law and with written approval or authorisation of the Group Chief Executive Officer. In the event approval has been obtained for providing gift or entertainment or corporate hospitality to any public officials or foreign public officials, one must ensure that the gift or entertainment or corporate hospitality is not excessive and lavish, and must commensurate with the official designation of the public official and not his personal capacity.

12.2 In dealing with public officials or foreign public officials, directors and employees of BPHB Group must not:

- (a) Circumvent any laws or policies with regards to gifts, entertainment and corporate hospitality even if it means that BPHB Group might lose out on business opportunities;

- (b) Be too complacent with certain public officials or local customs which he/she are familiar with;
- (c) Approve any request by public official to transfer the gift or entertainment or corporate hospitality to his/her family members or friends that are not authorised to accept such gift. In this situation, the public official need to be told that the transfer of gift or entertainment to third party other than the public official is against BPHB Group's policy;
- (d) Offer to provide gift, entertainment or corporate hospitality that are illegal or unduly dangerous, indecent, sexually oriented or disrespectful;
- (e) Exceed the monetary threshold as specify in the approved policy of BPHB Group; and
- (f) Conceal, alter, destroy or otherwise modify any documentation that relates to entertainment or corporate hospitality to public officials.

13.0 ANTI-MONEY LAUNDERING

- 13.1 BPHB Group strongly objects to practices related to money laundering, including dealing in the proceeds of criminal activities.
- 13.2 **Section 3 of the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001** defines money laundering offences such as engaging, acquiring, receiving, possessing, disguising, transferring, converting, exchanging, carrying, disposing, concealing, removing from or bringing to Malaysia or to impede the establishment of the true nature, origin, location, movement, disposition, title of, rights with respect to, or ownership of directly or indirectly, the proceeds of an unlawful activity or instrumentalities.
- 13.3 Money laundering is a very serious crime and the laws governing this type of crime can have extra territorial effect, i.e. the application of the law is extended beyond local borders. The penalties for breaching anti-money laundering legislation are severe and can include imprisonment, fines, and extradition in foreign jurisdictions.
- 13.4 To avoid violating anti-money laundering laws, employees are expected to always conduct counterparty due diligence to understand the business and background of BPHB Group of Companies' prospective business counterparties and to determine the origin and destination of money, property and services.
- 13.5 Counterparty means any party that the BPHB Group of Companies is currently in relationship with or intends to do business with in the future, either on a regular or once-off basis. Counterparties include but are not limited to contractors, sub-contractors, consultants, agents, and its representative.

14.0 RESPONSIBILITIES

- 14.1 All directors and employees of the BPHB Group must ensure that they have read, understood and comply with this ABC Policy and are required to avoid any activity that might lead to or suggest a breach of this Policy. All directors and employees are responsible for the prevention, detection and reporting of any bribery and other forms of corruption in the Group.

14.2 An employee must as soon as possible notify the Head of Division/Department or the IO should he/she suspects or believes that a breach of this Policy has occurred or may occur in the future.

15.0 RECORD KEEPING

BPHB Group must ensure and keep all financial records, all expenses claims relating to entertainment, gifts and have appropriate internal controls in place which will be the evidence for any payments made to third parties.

16.0 PROCEDURAL MATTERS

16.1 How to Raise a Concern or Complaint

All Directors and employees are encouraged to raise concern or complaint about any issue or suspicion of malpractice at the earliest possible stage. If in doubt as to whether such a particular act constitutes bribery or corruption, or should there be any queries, the employees should raise the queries or issues with the IO while the Director to consult with the Company Secretary.

16.2 What to do if an Employee is the Victim of Corruption or Bribery

It is important that the employee knows where to refer to should they be the victim of corruption or bribery. The employee should notify the Head of Division/Department or the IO or the head of department or division as soon as possible if the employee or another employee is offered a bribe by a third party or believe that another employee is a victim of another form of unlawful activity when acting on behalf of or in association with the Company or the BPHB Group.

16.3 Protection

- (a) Employees who refuse to accept or offer a bribe or those who raise concerns or complaints or report another employee's wrongdoings are sometimes worried about possible repercussions. BPHB Group encourages openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.
- (b) BPHB group is committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in corruption or bribery or because of reporting concerns under this Policy in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.
- (c) An employee who believes that he/she suffered any detrimental treatment as a result of refusing to take part in corruption or bribery or because of reporting concerns under this Policy in good faith, should raise the matter with the head of department or division or the Human Resources Management Division or the Head of Division/Department or the IO or follow the procedure as laid out under the **Whistle Blower Policy** of the BPHB Group.

16.4 Flow Chart on How to Raise a Concern or Complaint

Kindly refer to **Appendix II** on how to raise a concern or complaint.

17.0 TRAINING AND COMMUNICATION

- 17.1 BPHB Group shall ensure that all new directors, employees, associates and third parties shall be well informed of this ABC Policy through induction training while the existing employees will receive regular and relevant training on how to implement and adhere to this ABC Policy.
- 17.2 The BPHB Group's zero-tolerance approach to corruption and bribery should be communicated to all agents, suppliers, contractors, sub-contractors, consultants and business partners at the outset of the Company's business relationship with them and as appropriate thereafter. Wherever possible, all third parties should be sent a copy of this ABC Policy at the outset of the business relationship.

18.0 FURTHER CLARIFICATIONS

Should you require further clarification with regards to this ABC Policy, depending on the subject concerned, you may consult the IO or alternatively you can email any queries to...

For lodgement of complaints or seeking protection under Whistle Blower Policy, you may refer to our **Head of Group Internal Audit** or any person authorised in dealing with the Whistle Blower Policy.

“BPHB Group condemns any form of corrupt practices and bribery and shall take all measures to prevent corruption practices in its business dealings”

Corruption does not only ruin the corruptor but it can go beyond to ruin the entire BPHB Group and the nation as a whole”

Bintulu Port Holdings Berhad

Appendix I

	GIFT ACTIVITY REPORTING FORM (GARF)	REFERENCE NO.
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To be filed and submitted to the Integrity Unit within five (5) business days after receiving the gift or item in value, pursuant to the Anti-Bribery & Corruption Policy for Bintulu Port Holdings Berhad Group ("BPHB Group")

Name/Staff ID No.:	Company/Division/Position:	Date:
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DESCRIPTION OF ITEM RECEIVED

DISPOSITION OPTIONS (To be filled by the Head of Department/Division on the rightmost column below):

- The item received to be returned to its sender with a note of explanation about BPHB Group's No Gift Policy
- The item received can be retained by the recipient.
- The item received to be held for display in the Division/Department receiving it.
- The item received to be shared with other employees in the Division/Department.
- Other: _____

Item	Item Qty	Item Description and Sender	Date/Time Received	Actual/Estimated Value and its Source	HEAD OF DEPARTMENT/DIVISION COMMENTS: Disposition / Action to be Taken

SIGNING AND MANAGEMENT APPROVAL

MY SIGNATURE: By signing this form, I hereby certify that: -

- (1) I have read and understand the policies and regulations referred to in this document;
- (2) The information I have provided on this form is complete and accurate to the best of my knowledge;
- (3) I acknowledge my continuing obligation to complete and submit a new *Gift Activity Reporting Form* at any time during the year when there is any actual item received; and
- (4) I understand that any misstatement or omission in this disclosure may be a violation of applicable policies and regulations and may subject me to disciplinary action.

MANAGEMENT REVIEW: This form should be reviewed and signed by the Employee's Head of Department/Division. The Head of Department/Division is given the responsibility to assess the disposition of the gift or item received and implements the policy as stated.

Gift / Item Recipient: <div style="text-align: center;">SIGNATURE OVER PRINTED NAME / DATE</div>	Head of Department / Division: <div style="text-align: center;">SIGNATURE OVER PRINTED NAME / DATE</div>
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FOR INTEGRITY UNIT USE ONLY - - - DO NOT FILL THE PORTION BELOW

REMARKS:	
Integrity Officer: <div style="text-align: center;">SIGNATURE OVER PRINTED NAME / DATE</div>	Clerk Integrity Unit: (for Safekeeping) <div style="text-align: center;">SIGNATURE OVER PRINTED NAME / DATE</div>

ORIGINAL – Integrity Unit's Copy
DUPLICATE – Head of Department/Division Copy

HOW TO RAISE A CONCERN OR COMPLAINT

