



ANTI-BRIBERY AND CORRUPTION POLICY

1. Introduction

The Board of Directors of Chin Well Holdings Berhad (“CHINWELL”) has collectively approved and adopted this Anti-Bribery and Corruption policy. CHINWELL does not condone any acts of bribery and corruption. This policy should be read together with CHINWELL’s other policies and guidelines. CHINWELL complies with all applicable corruption laws and regulations, including the Malaysian Anti-Corruption Commission Act 2009, the Malaysian Anti-Corruption Commission (Amendment) Act 2018 and the Penal Code.

2. Scope

This policy applies to all Directors, employees, and business associates of CHINWELL.

3. Definitions

- 3.1 “Bribery and Corruption” refers to the provision or receipt of undue advantages of monetary or non-monetary value in violation of applicable law. This includes, but not limited to, extortion, fraud, collusion, abuse of power, embezzlement, money laundering and other similar activities.
- 3.2 “CHINWELL” or “The Company” refers to Chin Well Holdings Berhad, inclusive of its subsidiaries.
- 3.3 “Employee” refers to any individual currently under the employment of the Company, which includes permanent, part-time and contractual staff.

- 3.4 “Business Associate” refers to any individual or organisation that the Company comes into contract with during the course of its business, including actual and potential customer, supplier, distributor, agent, advisor, consultant, subcontractor and joint venture partner.

4. Gift & Hospitality

- 4.1 CHINWELL recognises that the exchange of business courtesies, for instance modest gift in monetary and non-monetary forms (e.g. voucher) or hospitality (e.g. meals, accommodation and travelling), is customary and legitimate in creating goodwill and strengthening commercial relationships. Such courtesies are therefore allowed but must not be lavish in light of accepted business practices.
- 4.2 As a general principle, all Directors and employees must not accept or provide, any form of gift or hospitality, from or to external party which the intention is to influence, obtain or retain business.
- 4.3 Similarly, the Company’s business associates must not seek, accept or provide any form of gift or hospitality, whether directly or indirectly, from or to the Company’s Directors or employees which the action would improperly influence their ethical business conduct.

5. Facilitation Payment

- 5.1 Facilitation payment is an unofficial payment made to an individual in power to secure or expedite the performance of a routine or administrative duty.
- 5.2 CHINWELL does not endorse the making and participation of facilitation payment. Employees must avoid attending to any event/ activity which may result in facilitation payment being made or received.

6. Donation

- 6.1 CHINWELL does not endorse any donation or contribution made to political party. However, the Company’s Directors, employees and business associates are not restricted to make any political donation in their own personal capacity.

- 6.2 Political donation will not be eligible for reimbursement from the Company.
- 6.3 Charitable donation or contribution made in good faith, monetary or otherwise, is acceptable by the Company. Directors and employees must ensure that charitable donation is not to be used as a means to facilitate or conceal any acts of bribery and corruption.
- 6.4 Charitable donation can only be proposed and made with approvals from the Executive Director.

7. Record-Keeping

- 7.1 All accounts, journals, records and documents (soft-copy and hard-copy) for any payments made to business associates, and other third parties, are to be prepared with accuracy and completeness. It is not allowed to be kept “off-the-book” to conceal undue or improper payments.
- 7.2 All Directors and employees are to ensure that all gifts and hospitality accepted or offered, which could potentially be construed as bribery or corruption, have been approved and the reasons for the transactions specifically recorded.
- 7.3 These transactions are to be documented and maintained by the Company’s Finance department which will be subject to an internal audit review.

8. Non-Compliance

- 8.1 Non-compliance with this policy may result in disciplinary actions, including immediate termination of employment, to be taken against the offending Directors or employees.
- 8.2 The Company will enforce a termination of contract with its business associates if they have been found to be involved in bribery and corruption and proven beyond reasonable doubt.
- 8.3 Further legal action may be taken against the offending parties if the Company’s reputation and interest has been impacted as a result of violation of this policy.

9. Reporting of Violation

- 9.1 Any Directors, employees or business associates who know of any actual or suspicious violation of this policy is encouraged to report such concerns through the reporting channel set out in the Company's Whistleblowing Policy.

10. Disclaimer

- 10.1 This policy is non-exhaustive and does not examine all instances of anti-bribery and corruption practices. It is advised that you seek clarification from the Company if you are uncertain that your action will contravene the contents of this policy.