



GUH Holdings Berhad

Anti-Bribery and Corruption Policy



Table of Contents

Part 1: Introduction	3
1A Policy Statement	
Part 2: Gift	3
2A “No Gift” Policy	
Part 3: Facilitation Payment	4
3A General	
Part 4: Entertainment	4
4A General	
Part 5: Donations and Sponsorships (DS)	5
5A General	
Part 6: Conflict of Interest	5
6A General	
Part 7: Responsibilities of GUH Group Employees and Dealing with Third Parties	6
7A GUH Group Employees	
7B Third Parties	
7C Mergers, Acquisitions, Investments and Joint Ventures (MAIJ)	
Part 8: Whistleblowing	7
8A General	
Part 9: Sanctions for Non-Compliance	7
9A General	



Part 1 INTRODUCTION

1A Policy Statement

GUH Group takes a zero-tolerance approach to bribery and corruption by acting with integrity in all of our business dealings. This means preventing practices of bribery and corruption from happening in GUH Group's daily operations.

It is our policy to conduct all of our businesses in an ethical manner yet upholding all relevant laws to combat bribery and corruption.

The purpose of this policy is to:

- a) Create awareness and cascade GUH Group's direction in complying with laws against bribery and corruption; and
- b) Provide guidance to govern the management of bribery and corruption issues.

Part 2 Gift

2A "No Gift" Policy

GUH Group has adopted a "No Gift" Policy whereby all the employees are prohibited from receiving or providing gifts even though certain exceptions are applied.

The employees have the responsibility of informing external parties that GUH Group practices a "No Gift Policy" and to request for their understanding and compliance with this policy.

Lavish or unreasonable gifts or hospitality are not acceptable as it may be deemed to be influential in business decision and they may be perceived as trying to obtain or receive favorable business treatment.



Part 3 Facilitation Payment

3A General

GUH Group disallows giving or receiving any facilitation payment in the Company's daily business operation as it is seen as a form of bribery and corruption.

Part 4 Entertainment

4A General

GUH Group recognises that providing modest entertainment is a legitimate way of building business relationships. However, it is never permissible to provide entertainment in order to improperly influence anyone.

It is allowable to pay for reasonable expenditures pertaining to entertainment, provided that:-

- It is for legitimate business purposes.
- In accordance with local law.
- Not made with a corrupt purpose.
- It is infrequent, modest and does not exceed the thresholds set out in the Company's Terms and Conditions Table of Employment.
- It was not solicited by the recipient.
- It does not give the appearance of creating an obligation for the recipient.
- It is reported and documented accurately in the Company's books and records.
- It cannot be construed as a bribe or payoff.

Part 5 Donations and Sponsorships (DS)

5A General

As DS ordinarily are regarded as good corporate social responsibility, they (of cash or in kind) may be authorised and given under the following circumstances:-

- Such contributions are in compliance with applicable laws.
- Necessary authorisations are obtained.
- DS to be made to well established entities.
- DS to be recorded completely and accurately.
- DS not to be used on bribery purpose.

Prior to making DS, the background of the intended recipient must be reviewed to establish that it is a bona fide entity. Apart from that, approval from the appropriate level of Company management is required to be obtained.

Part 6 Conflict of Interest

6A General

Conflicts of interest arise in situations where there is potential interference between personal interest and objectivity in performing duties or exercising judgment on behalf of the Company.

All employees should avoid the potential emergence of conflict of interest in performing their daily work task.

All employees must not use the Company's resources, information and assets for personal gain.

In the event where conflict of interest does occur, employees are required to declare such matter to the appropriate level of Company management i.e. Human Resource Department and recuse themselves from any decision-making position if required.

Part 7 Responsibilities of GUH Group Employees and Dealing with Third Parties

7A GUH Group Employees

All GUH Group employees are required to perform those responsibilities in relation to the Company's anti-bribery and corruption stance, which encompass the following:-

- Learn and comply with applicable requirements of this policy
- Promptly document all transactions in books and records with sufficient detail
- Consult with appropriate approving authority if there is any doubt arise on this policy
- Report to immediate superior or to whistleblowing channels if encountering suspicious transactions
- Do not misuse the Company's resources
- Do not violate or breach this policy
- Attend required anti-bribery and corruption trainings

7B Third Parties

For the purposes of this section, references to third parties shall refer to non-governmental, for-profit third parties providing or receiving goods or services to and from the GUH Group.

Due diligence reasonable endeavour should be conducted on random third parties to ensure that the entity is not committing or has not committed an act of bribery or corruption while performing its work with GUH Group.

Third parties engaging with GUH shall comply with the terms and conditions of this policy at all material times. All third parties are expected to avoid any activity that might lead to a non-compliance with this policy and at the same time implementing prevention, detection and reporting of corruption in their daily business operation.

Third parties may report real or suspected corruption incidents or inadequacies of the Company's anti-corruption programme in accordance with the Company's whistleblowing policy. GUH Group shall endeavour to include clauses in all contracts enabling the Group to terminate the contract where a breach of this policy has occurred. GUH Group reserves its right to terminate a contractual relationship with third parties if non-compliance with the law is established.

7C Mergers, Acquisitions, Investments and Joint Ventures (MAIJ)

Provided that the GUH Group's criteria is met, the Company must undertake counterparty due diligence in evaluating MAIJ. Methods may include background checks or a document verification process. Counterparties are made aware of this policy and the Company's expectations of them. GUH Group shall periodically monitor counterparties performance and business practices to ensure ongoing compliance.



Part 8 Whistleblowing

8A General

Appropriate reporting channels have been established and maintained to allow and encourage whistleblowers to report in good faith any real or suspected corruption incidents or inadequacies of the Company's anti-corruption programme. Information shall be managed securely to ensure the confidentiality of a whistleblower's identity and the information reported.

Employees and external parties are encouraged to report their concerns by following the steps which stated in the Whistleblowing Policy if they are encountering actual or suspected violations of this policy.

Reports which made in good faith shall be addressed in a timely manner without incurring fear of reprisal.

Retaliation in any form against whistleblowers is strictly prohibited provided such reports are made in good faith. Any employees found to have deliberately acted in retaliation against such whistleblowers may be subjected to disciplinary proceedings.

Part 9 Sanctions for Non-Compliance

9A General

Non-compliance may lead to penalties, including termination of employment (for Company's employees) and termination of contract (for external parties). Further legal action may also be considered if the Company's interest has been impacted caused by the non-compliance.

The Company reserves the right to report the incidents of bribery or corruption to the relevant authorities.