



EKOVEST BERHAD

Registration No. 198501000052 (132493-D)

ANTI-CORRUPTION POLICY AND FRAMEWORK

**ANTI-CORRUPTION POLICY AND
FRAMEWORK****Table of Contents**

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I. INTRODUCTION

Ekovest Berhad and its subsidiaries (together, the “Group”) adopt a **ZERO TOLERANCE** approach towards bribery and corruption.

It is our policy that the Group shall conduct its business honestly and ethically. The Group is committed to acting professionally, fairly and with integrity in all our business dealings and relationships. In achieving this, the Group aims to implement, operate and enforce an effective system and framework to counter bribery and corruption.

In order to establish adequate structure and procedures to prevent corrupt practices in the Group, we have developed this Anti-Corruption Policy and Framework (“ACPF”) based on the principles outlined in the Guidelines on Adequate Procedures (“GAP”) issued by the Prime Minister’s Department of Malaysia.

This ACPF is made up of six (6) pillars below:

The objectives and the respective responsibilities of the Board and Management in relation to each of these pillars are elaborated in the following pages.

The ACPF is intended to apply to every director, member of senior management and employee of the Group (including temporary and part-time employees). Joint venture and associate companies in which the Group has equity but no controlling interest are also required to adopt either Ekovest’s ACPF or their own standards of principles on corruption prevention, whichever is more stringent.

Similarly, apart from directors, officers, management and employees of the Group, the Group also expects that its contractors, sub-contractors, consultants, agents and their representatives to comply with the relevant sections of the ACPF when performing their work or services for or on behalf of the Group.



**ANTI-CORRUPTION POLICY AND
FRAMEWORK****II. TONE AT THE TOP****a. Overview**

The Board takes issues relating to bribery and corruption very seriously. Therefore, all policies, anti-corruption related matters, efforts and initiatives are to be dealt with, and approved by the Board.

The Board has towards this end defined and laid down its ACPF, Code of Conduct and Ethics (“CCE”) and Anti-Bribery and Gratification Guidelines (“ABGG”); setting the “tone from the top” on core principles and guidance to deal with all anti-corruption related matters, efforts and initiatives. The issues and procedures on how to prevent improper solicitation, bribery, handle reports of bribery or suspected bribery, putting in place mitigation measures, conducting continuous monitoring and review and training, as well as the Board’s and Management’s responsibilities are set out herein.

As a matter of policy, the Board expects all its directors, senior management, employees, contractors, subcontractors, consultants, agents, representatives and others performing work or services for or on behalf of the Group to understand and comply with the



relevant parts of the CCE and ABGG when performing their work or services.

Similarly, all joint ventures and associated companies of the Group are required to adopt similar or higher standards of principles on corruption prevention.

b. Board’s Responsibilities

The Board is primarily responsible to:

- i. Establish, maintain, and periodically review the effectiveness and adequacy of its anti-corruption compliance policies and programme comprising primarily of the ACPF and ABGG in addressing and mitigating corruption risks;
- ii. Practise the highest level of integrity and ethical standards by promoting professionalism in everything the Group does;
- iii. Keep abreast of and ensure full compliance with applicable legal

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II. TONE AT THE TOP (Cont'd)

and regulatory requirements on anti-bribery and anti-corruption;

- iv. Ensure that the authority and independence of the oversight function on anti-corruption compliance policies and programme are appropriate; and
- v. Ensure that changes, updates and enhancements of the Group's anti-bribery and anti-corruption policies are made available on its website, and appropriately displayed to both internal and external stakeholders.

c. Management's Responsibilities

The management is responsible for implementation of the Group's anti-corruption policies and programme, *inter alia*:

- i. Adequate anti-corruption compliance policies and programme that effectively address corruption risks;

Financial and organisational controls such as segregation of duties, limit of authority for approving transactions, and tender and quotation procedures;

- ii. Record keeping and documentation related to anti-corruption initiatives and activities; and
- iii. Communicate* the Group's policies and commitments on anti-corruption to all Ekovest Group personnel and business associates.

**Please refer to Appendix I: Guidelines for Communication of Ekovest Policies on Anti-Corruption and Bribery*

**ANTI-CORRUPTION POLICY AND
FRAMEWORK****III. RISK ASSESSMENT AND
INTERNAL CONTROL****a. Overview and Objective**

Corruption risk assessment is aimed to identify corruption risk exposure in order to improve the Group's ACPF and systems of internal control to counter bribery and corruption.

b. Board's Responsibilities

The following are the responsibilities of the Board in order to mitigate the corruption risk exposure in the Group:

- i. Review the Group's corruption risk exposures periodically or when there are changes in law, circumstance of the business and/or the profile of its business associates. The result of this review should also be used to enhance the Group's ACPF accordingly;
- ii. Establish and maintain an effective system of internal controls to counter corruption and bribery in the Group. This system of internal controls shall include financial and organisational checks and balances, the Group's business and accounting and record keeping practices, protection of the whistleblower's anonymity and the

confidentiality of the information provided, verification of the accuracy and completeness of information published in the website concerning the Group's anti-corruption policies; and

- iii. Obtain assurance from Audit and Risk Management Committee ("ARMC") that ACPF is functioning effectively in managing corruption risks.

c. Management's Responsibilities

Management is responsible for establishing, managing and enhancing the effectiveness of the Group's financial, operational and compliance controls in preventing bribery and corruption. These control procedures shall include (but are not limited to) the following:

- Tender and quotation procedures;
- Related party transaction;
- On-boarding screening;
- Payment approval;
- Offering of gift, donation, referral, hospitality, sponsorship; and
- Investigation procedures for complaint and whistleblowing.

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IV. ON-BOARDING SCREENING PROCESS

a. Overview and Objective

On-boarding screening assessment should be carried out for individuals or third parties including service provider, contractor, consultant, professional, supplier, commercial agent or distributor.

The objective of the on-boarding screening process is to identify the Group's corruption risk exposure prior to entering into business dealings with third parties. Further, this process will include the keeping of records and appropriate documentation in relation to such dealings.

b. Board's Responsibilities

The Board should:

- i. Ensure the establishment of adequate on-boarding screening procedures for the Group's business associates; and

- ii. Be satisfied with the management effectiveness in monitoring, documentation and disclosure of transactions by those individuals identified under this on-boarding screening process (the "identified individuals").

c. Management's Responsibilities

Management is required to:

- i. Establish and implement the on-boarding screening process;
- ii. Record, document and keep adequate information and documents for transaction involving the identified individuals; and
- iii. Immediately stop business dealing with the identified individuals when it becomes clear or appears likely that these parties are engaging in inappropriate or illicit practices.

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V. REVIEW, MONITORING AND AUDIT

a. Overview and Objective

Review, monitoring and audit should form the basis for the Group's efforts to continually improve and enhance its anti-corruption framework or ACPF.

b. Board's Responsibilities

The Board should:

- i. Ensure that the Group establishes a monitoring plan covering the scope, frequency, methods for review and the appointment of competent team to assess organisation's anti-corruption framework; and
- ii. Assess the performance of management and employees in relation to the anti-corruption policies and procedures to ensure their understanding and compliance with the organisation's stance in their respective roles and functions.

The Board may delegate its function on review, monitoring and audit of the ACPF to the ARMC.

c. Management's Responsibilities

Management should:

- i. Identify and appoint suitable staff member to overseeing the ACPF;
- ii. Document, maintain and make available for inspection records of all financial transactions and activities that took place in implementing and complying with the ACPF;
- iii. Regularly review and assess its performance, efficiency and effectiveness in relation to the anti-corruption framework and enforcement thereof;
- iv. Ensure that the results of any reviews of ACPF, counter measures and recommendations are reported to the Board and acted upon; and
- v. Update the Board about its new enhancement initiatives and status on ACPF.

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VI. REVIEW, MONITORING AND AUDIT (Cont'd)

d. Internal Auditor's Responsibilities

Group's ACPF and ABGG shall be subject to Internal Auditors' annual review to ensure compliance adequacy and effectiveness of these policies in managing the bribery risk in the Group. Upon review, the Internal Auditors shall report their findings and recommendations to the ARMC accordingly.



VI. TRAINING AND AWARENESS

a. Overview and Objective

Besides keeping employees, business associates and other stakeholders updated on the latest regulations and best practices on anti-corruption, the primary purpose of training is to communicate the Group’s anti-corruption stance and to strengthen the stakeholders’ commitment to comply with the regulations through awareness creation.

The Group shall conduct training and awareness programmes to all directors, senior management, employees, business associates and persons performing services on behalf of the Group. They shall at a minimum be provided with the essential training to familiarise them with the Group’s ACPF, ABGG, whistleblowing policy and on-board screening process. Records pertaining to training and communication programmes shall be kept and maintained.

b. Board’s Responsibilities

The Board should:

- i. Ensure that adequate training is provided to all Board members and key stakeholders of the Group; and
- ii. Evaluate before the appointment of competent and qualified trainer(s)

(who may either be an external third party or a member of Management) to conduct such essential trainings to the Group personnel and business associates.

c. Management’s Responsibilities

Management is required to:

- i. Implement “Train-The-Trainer” sessions to identify suitable trainer(s) for conducting the essential training;
- ii. Schedule training session and identify the trainer(s) and participants;
- iii. Incorporate the essential training into the Group’s induction training to all new employees;
- iv. Conduct refresher essential training on a periodic basis; and
- v. Perform an analysis of training needs and recommend the types of training enhancement and format* needed

**Please refer to Appendix III Guidelines for Training of Ekovest Policies on Anti- Bribery and Gratification Guidelines*

**ANTI-CORRUPTION POLICY AND
FRAMEWORK****VII. WHISTLEBLOWING****a. Overview and Objective**

The Group's Whistleblowing Policy is made available on the Group's corporate website at <https://www.ekovest.com.my> and it intends to provide guidance and comfort to whistleblowers for reporting wrongdoings and violations of the CCE and ABGG.

b. Board's Responsibilities

The Board is responsible to:

- i. Ensure the establishment of an accessible and trusted whistleblowing channel for internal and external parties to raise concerns or report another's wrongdoing in relation to real or suspected corrupt activities;
- ii. Establish a secure information system to ensure the confidentiality of the whistleblower's identity and the information reported in order to avoid retaliation in any form against those making reports in good faith;
- iii. Determine appropriate methods for conducting investigations; and

- iv. Initiate appropriate action (including disciplinary and/or other action required by applicable law) against the wrong doers.

c. Management's Responsibilities

The members of management who has been identified by the ARMC for conducting investigation pursuant to the Group's Whistleblowing Policy shall:

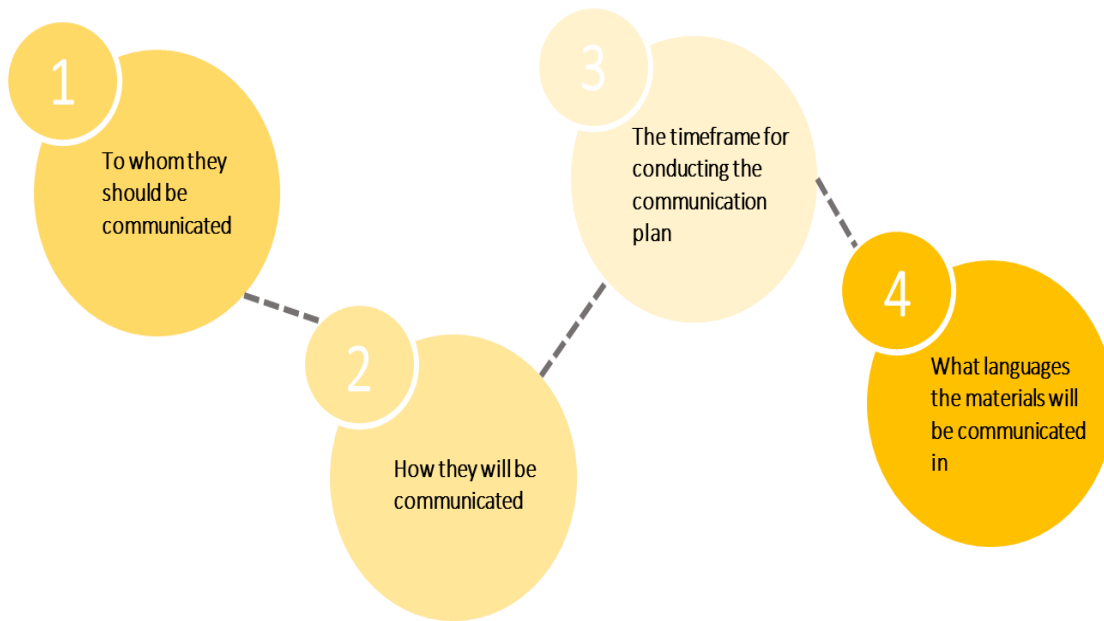
- i. Ensure that the identity of the whistleblower and the details of the complaint are kept confidential at all times. In addition to that, the Group shall ensure that there will be no repercussions or retaliation on the whistleblower as a result of the complaint;
- ii. Report solely and timely to the ARMC and should not inform or notify the individual/party that is the subject of the investigation.

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Appendix I:

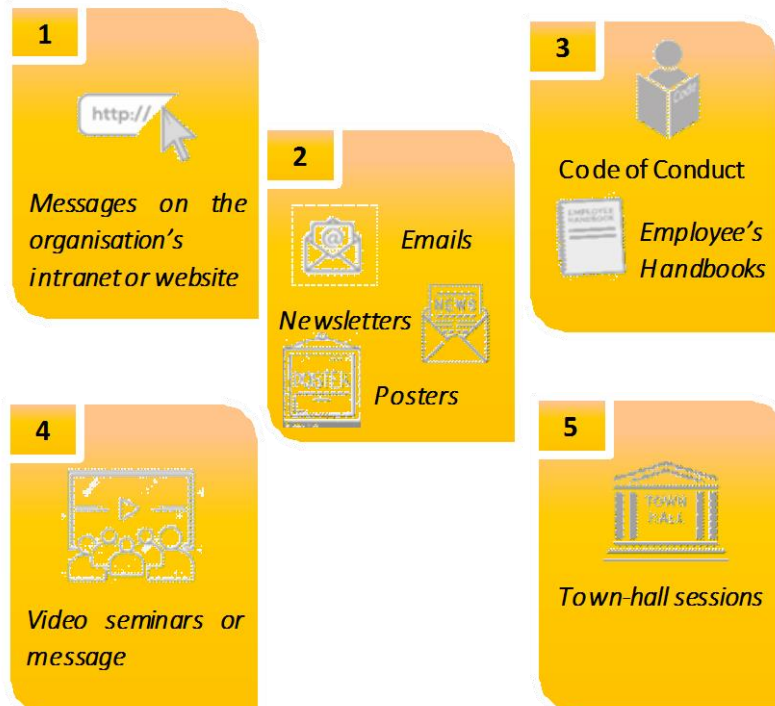
Guidelines for Communication of Ekovest Policies on Anti- Corruption and Bribery

Following are the key points which should be taken into consideration by the Board and management when communicating the Group’s position on anti-corruption:



***Note:**

The communication may be conducted in a variety of formats and mediums including but not limiting to:



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Appendix II:

Guidelines for Training of Ekovest Policies on Anti- Corruption and Bribery

The training may be conducted in a variety of formats, including but not limiting to:

