

BPPLAS Anti-Bribery and Anti-Corruption (“ABAC”) Framework



1. Introduction

BPPLAS is firmly committed to operating as a fair and responsible business and within the laws of any jurisdiction in which it conducts business activities. As articulated in our Group’s *Code of Conduct*, we are committed to implementing anti-corruption measures and endeavour to uphold ethical conduct in all our business relationships. BPPLAS maintains and undertakes a **zero-tolerance** approach to bribery and corruption.

BPPLAS implements a robust Anti-Bribery and Anti-Corruption (“ABAC”) Framework that strictly complies with the Malaysian government’s guidelines on adequate procedures, pursuant to subsection (5) of section 17A of the Malaysian Anti-Corruption Commission Act 2009 (Act 694), restated in the Malaysian Anti-Corruption Commission (Amendment) Act 2018.

The Framework and Policy are enacted to safeguard the reputation of as well as business and consumer confidence in BPPPLAS.

The Group’s ABAC Policy has established a set of guidelines relating to the bribery and corruption.

2. Prevention of Bribery and Corruption

BPPLAS is committed to a holistic approach to deter and prevent bribery and corruption. The underlying guidelines for adequate procedures under BPPLAS’s *ABAC Policy* are divided into five core principles, collectively known as the “**T.R.U.S.T**” principle.

2.1 Top-Level Commitment

Top-Level Management, which includes the Board and senior management, is firmly committed to setting, promoting and ensuring a corruption-free culture within BPPLAS. The aim is to achieve ‘Tone at The Top’, supporting the Group’s practice of the highest level of integrity and ethics, compliance with applicable laws and regulatory requirements on anti-corruption, and effective management of key corruption risks.

2.2 Risk Assessment

BPPLAS is committed to conducting annual Corruption Risk Assessments to identify, analyse, assess and manage the internal and external corruption risks facing the Group. The Management Risk Management Committee will also conduct periodic/continuous review and update the *ABAC Policy* when there is change in law or material change in the environment or current policies and procedures are inadequate.

2.3 Undertaking Control Measures

BPPLAS is committed to establishing appropriate controls and contingency measures to address any corruption risks potentially arising from weaknesses in the Group's governance framework.

The measures include the following key policies:

Due Diligence

Sufficient due diligence is required to be undertaken on relevant third parties in relation to BPPLAS's business dealings. Key measures include background checks, document verification, or interviews to detect bribery and corruption risks.

Policies and Procedures

BPPLAS's *Whistleblower Policy* provides a safe avenue by which an employee/officer can report or disclose concerns anonymously about suspected or actual bribery or corruption via established channels without fear of retaliation. The procedures of whistle-blowing are comprehensively set out in the Group's *ABAC Policy* and *Code of Conduct*, and aims to promote and encourage the escalation and reporting of bribery and corruption concerns.

The BPPLAS's *Gifts and Entertainment Policy* outlines the basic guidelines on the acceptable gifts and entertainment, while the *ABAC Policy* sets out the comprehensive guidelines to mitigate against risks arising out of the giving and accepting of charitable donations/contribution/sponsorships.

2.4 Systematic Review, Monitoring and Enforcement

Annual review is conducted to assess the performance, efficiency and effectiveness of the anti-corruption programme. Reviews can be carried out by Management Risk Management Committee with the assistance of the internal auditor-

Any non-compliance with the *ABAC Policy* will result in disciplinary measures.

2.5 Training and Communication

BPPLAS is committed to ensuring that the Group's *ABAC Policy* is made publicly available on the Group's official website (www.bpplas.com), and is appropriately communicated to all its employees, suppliers, contractors, agents, business and other partners.

Training and Awareness Programmes will be conducted to ensure that all employees are fully aware of the anti-bribery and anti-corruption programmes and regulations that are put in place, as well as consequences of non-compliance.