



# ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

<b>POLICY NO.</b>	PMP003V01
<b>EFFECTIVE DATE</b>	OCTOBER 2025

Table of Contents

- 1 OVERVIEW..... 1**
- 2 INTRODUCTION..... 1**
- 3 OBJECTIVE..... 1**
- 4 SCOPE..... 1**
- 5 DEFINITIONS..... 1**
- 6 ROLES AND RESPONSIBILITIES ..... 3**
  - 6.1 BOARD OF DIRECTORS ..... 3
  - 6.2 TOP MANAGEMENT ..... 3
  - 6.3 MANAGEMENT..... 3
  - 6.4 ALL EMPLOYEES..... 3
- 7 POLICY STATEMENT ..... 4**
  - 7.1 GIFT, ENTERTAINMENT AND HOSPITALITY ..... 4
  - 7.2 CORPORATE SOCIAL RESPONSIBILITY (CSR)..... 4
  - 7.3 SPONSORSHIPS AND DONATIONS ..... 4
  - 7.4 DUE DILIGENCE ..... 5
  - 7.5 PUBLIC OFFICIALS..... 6
  - 7.6 MONEY LAUNDERING..... 6
  - 7.7 POLITICAL CONTRIBUTIONS ..... 6
  - 7.8 FACILITATION PAYMENTS ..... 7
  - 7.9 WHISTLEBLOWING (WB)..... 7
  - 7.10 RECORD KEEPING..... 8
- 8 NON-COMPLIANCE ..... 8**
- 9 REPORTING..... 8**

## 1 OVERVIEW

Perodua group of companies is committed to promoting and maintaining the highest level of ethical standards to ensure our corporate environment in relation to all of our business activities are in line with the prevailing MACC Act and all applicable laws with respect to combating bribery and corruption.

At this juncture, this policy outlines the principles to ensure Perodua group of companies minimize the risk of bribery and corruption across its organization.

## 2 INTRODUCTION

Bribery and corruption are a widespread phenomenon. It raises serious social, moral, economic and political concerns, undermines good governance, hinders development and distorts competition. Although there are laws addressing bribery and corruption, organizations also have a responsibility to proactively combat bribery and corruption. A well-managed organization is expected to institute a compliance policy on anti-bribery and anti-corruption supported by appropriate management systems to comply with legal obligations and maintain integrity. An Anti-Bribery and Anti-Corruption Policy and its supporting management system would assist Perodua group of companies in avoiding or mitigating the probable costs, risks, and damages of bribery, fraud and corruption.

## 3 OBJECTIVE

The objective of the Anti-Bribery and Anti-Corruption Policy is to ensure that Perodua group of companies operate its businesses towards zero corruption. It also serves as a guideline on how to recognize and deal with bribery, fraud and corruption issues and comply with the laws and regulations, particularly the MACC Act. The "Adequate Procedure" of "T.R.U.S.T" is being used to prohibit fraud and bribery in any form, whether direct or indirect.

## 4 SCOPE

This policy is applicable to ALL employees, directors and business associates of the Perodua group of companies who are either permanent or contractual.

## 5 DEFINITIONS

**Board** refers to the Board of Directors, which consists of members representing the shareholders of Perodua group of companies.

**Bona fide** is a Latin phrase meaning good faith, used to describe anything that is genuine or honest.

**Bribery** is defined as offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting.

**Company** refers to the Perodua group of companies and its subsidiaries, except subsidiary companies that operate independently.

**Corruption** is defined as dishonest or fraudulent conduct by those in power.

**Employee** refers to all staff, management, directors and representatives of Perodua group of companies who are permanent, temporary or contractual basis.

**Facilitation payment** is defined as payments made to secure or expedite the performance by a person performing a routine or administrative duty or function. Facilitation payments need not only involve cash or other financial asset. It can also be any sort of advantage with the intention to influence the person in charge of his/her duties.

**Fraud** means wrongful or criminal deception intended to result in financial or personal gain by himself/herself or on behalf of another person.

**MACC** (or SPRM) is an abbreviation of the Malaysian Anti-Corruption Commission (or Suruhanjaya Pencegahan Rasuah Malaysia); a government agency in Malaysia that investigates and prosecutes corruption practices in the public and private sectors.

**Management** refers to Managers up to Senior Directors.

**Money laundering** is when the criminal origin or nature of money or assets is hidden in legitimate business dealings or when legitimate funds are used to support criminal activities, including financing terrorism.

**Non-Governmental Organization (NGO)** is defined as a non-profit organization that operates independently of any government with the purpose of addressing social or political issues.

**Public official** is defined as a candidate from government office either federal or state or any political party, and offices in federal/state-owned enterprises other than Perodua group of companies.

**Third party** is defined as contractors, suppliers, vendors, dealers, agents, consultants, joint venture partners, introducers/government intermediaries, non-governmental organizations (NGO) etc. It not only includes any party that Perodua group of companies is currently in a relationship with in but also intends to do business within the future.

**Top Management** refers to the Head of Companies, the President and Chief Executive Officer.

**“T.R.U.S.T” Principles** refers to a guideline on adequate procedures established by the Governance, Integrity and Anti-Corruption Center (GIACC) of the Prime Minister’s Department to assist commercial organizations in preventing corrupt practices in relation to business activities. The principles consist of (T)op Level Commitment, (R)isk Assessment, (U)ndertake control measures, (S)ystematic review, monitoring and enforcement and (T)raining and communication.

## 6 ROLES AND RESPONSIBILITIES

### 6.1 Board of Directors

The Board of Directors shall have the overall understanding, approval and accountability for the implementation and compliance of the Anti-Bribery and Anti-Corruption Policy.

### 6.2 Top Management

- a) Top Management shall ensure that the responsibilities and authorities for relevant roles are assigned and communicated within and throughout every level of the organization.
- b) Top Management shall ensure adequate and appropriate anti-bribery awareness and training to employees.
- c) Top Management is responsible for establishing, implementing, maintaining and reviewing policies related to bribery, fraud and corruption.
- d) Top Management shall assign a responsible department to handle governance related matters for:
  - (i) Overseeing the design and implementation of the anti-bribery management system in the Company;
  - (ii) Providing advice and guidance to personnel on the anti-bribery management system and issues relating to bribery, fraud and corruption;
  - (iii) Reporting on the performance of the anti-bribery management system to the governing committee.

### 6.3 Management

- a) Management shall communicate on this policy internally and externally.
- b) Management shall attend training pertaining to bribery, fraud and corruption as required.
- c) Management at every level shall be responsible for requiring that this policy is applied and complied with within their division, department and/or function.

### 6.4 All employees

All employees shall be responsible for understanding, complying with and applying the ABAC Policy in relation to their roles in the organization.

## 7 POLICY STATEMENT

The Company takes a zero-tolerance approach to prohibit bribery, fraud and corruption and is committed to acting professionally, fairly and with integrity in all business dealings and relationships. All employees are required to conduct the company's business in an honest and ethical manner.

Bribery, fraud and corruption can take many forms, and special attention needs to be given to:

### 7.1 Gift, Entertainment and Hospitality

- a) The Company has adopted a "No Gift" Policy, which generally prohibits its employees, directors, and anyone acting on behalf of the Company (including family members) from directly or indirectly giving or receiving gifts, entertainment and hospitality, with a few exceptions.
- b) This clause shall be read together with the Code of Conduct and the No Gift Policy to ensure that such actions are exercised with good judgment.

### 7.2 Corporate Social Responsibility (CSR)

- a) In general, the Company is committed to CSR by contributing to social activities in appropriate circumstances and manner.
- b) Such contributions must be approved in accordance with the Financial Authority Limit.
- c) Any request for such activities shall be carefully examined for legitimacy and appropriate due diligence must be correlated to ensure the benefits reach their intended recipients.
- d) If there is any doubt whether the requested charitable contribution or social benefit is appropriate or legitimate, consult with the responsible department(s).

### 7.3 Sponsorships and Donations

- a) Sponsorship and donations can be given only if they are ethical and in compliance with this policy, as well as local and applicable laws. No donation should be accepted that may, or may be perceived to breach the applicable law, or any other section of this policy.
- b) All donations and sponsorship must be approved according to the Company's Financial Authority Limit, and the responsible department shall keep accurate records of all donations received or made by the Company.
- c) The responsible department(s) must ensure that all sponsorships and donations are not used as a deception for bribery or to avoid any of the provisions of the bribery.

- d) The donations and beneficiaries are not disguised as illegal payments to public officials.

## 7.4 Due Diligence

### 7.4.1 Third Party

- a) When dealing with third parties, conduct appropriate risk-based due diligence and implement appropriate steps to address any identified risks to ensure compliance with the applicable anti-bribery and corruption laws.
- b) Ensure to do business with third parties with the standard of integrity as per the following:
  - (i) Conduct due diligence to assess the integrity of the Company's prospective business with the third party.
  - (ii) Do not enter into any business dealing with any third party reasonably suspected to be engaging in bribery and improper business practices unless those suspicions are investigated and resolved.
  - (iii) Continue to be aware of and to periodically monitor third-party performance and business practices to ensure ongoing compliance.
  - (iv) If at any point during the due diligence exercise or in the dealings with a third party, there are conflicts of interest or 'red flags' raised, these warrant further investigations and must be sufficiently addressed before the engagement of the third party can progress.
  - (v) At any point during ongoing business, the third party was found to be legally guilty due to corruption or fraud activities, the Company reserves the right to review/reconsider/re-evaluate and potentially terminate the agreement or contracts with the other party.
- c) Letter of appointment should be issued to third parties already appointed by the Company, and a Termination clause is added to the agreement.

### 7.4.2 Recruitment of Employees

- a) The recruitment of employees should be based on approval selection criteria to ensure that only the most qualified and suitable individuals are employed. This is crucial to ensure that no element of corruption is involved in the hiring of employees.
- b) In line with this, proper background checks should be conducted for critical positions, including but not limited to security, purchasing, procurement and vendor management, in order to ensure that the

potential employee has not been convicted in any bribery or corruption cases nationally or internationally.

- c) Due diligence should be conducted when hiring employees who would be responsible in management positions, as they would be tasked with decision-making obligations.

#### 7.5 Public Officials

- a) Caution must be exercised when dealing with public officials as the law of bribery, fraud, and corruption leads to severe punishments.
- b) Providing gifts, entertainment or corporate hospitality to public officials or their family members is generally considered a 'red flags' situation in most jurisdictions.
- c) It is prohibited to pay for non-business travel and hospitality to any government officials or his/her family/household members without permission from the President and CEO (PCEO) of the Company.
- d) All Perodua employees are required to be vigilant of any applicable laws governing their activities and must ensure compliance with the applicable laws.

#### 7.6 Money Laundering

- a) The Company strongly objects to practices related to money laundering, including dealing with the proceeds from criminal activities.
- b) Avoid dealing with parties who are known to be committed with money laundering.
- c) To avoid violating anti-money laundering laws, employees are expected to always conduct third party due diligence to understand the business and background of the Company's prospective business counterparties and to determine the origin and destination of money, property and services.

#### 7.7 Political Contributions

- a) If any contribution is made, it must be permissible under applicable laws, and must not be made with any promise or expectation of favourable treatment in return and must be accurately reflected in the Company's books and records.
- b) " Bona Fide" payments to a government entity, such as payments to the host country's federal treasury required by contract or law, are not prohibited, so long as they are made with due care to the government entity and not to any official.
- c) Approval for such contributions shall be made in accordance with the Financial Authority Limit.
- d) The Company does not restraint employees from participating in a political election process so long as it does not tarnish the Company's image and not

during working hours. Employees may choose to make personal political contributions as appropriate within the limits established by law, but under no circumstances should they make any representation that they are doing so on behalf of/with the support of the Company.

- e) The Company and its employees are prohibited from acting in the following manner:
- (i) Using their position with the Company to try to influence any other person (whether or not employed by the Company) to make political contributions or to support politicians or their parties in any country.
  - (ii) Make any contribution or incur any expenditure using the Company resources to benefit any political campaign, party or politician in any country.
  - (iii) Using the Company's facilities, equipment and resources for any political campaign or party functions.
  - (iv) Using charitable donations as a deception for prohibited political payments.

#### 7.8 Facilitation payments

- a) Offering, promising or requesting facilitation payments is just as prohibited as actually paying or receiving facilitation payments.
- b) Employees are prohibited from accepting or obtaining, either directly or indirectly, facilitation payments from any person for the benefit of the employee himself or any other person (including employees who participate in the conspiracy).
- c) Should employees receive a request for or be offered facilitation payments, it is their duty to promptly notify their superior or report to Perodua's Whistleblowing channel.

#### 7.9 Whistleblowing (WB)

- a) The Company encourages employees to raise concerns and report in good faith, openness, and transparency in the commitment to the highest standard of integrity and accountability.
- b) Whenever an employee is offered a bribe by a third party, or asked to make a bribe, or suspected of committing such a violation, or is believed to be a victim of any form of unlawful activity, the employee must comply with this policy.
- c) If an employee suspects another person has violated or about to violate this policy or applicable law, whether deliberately or inadvertently, a report can be made to the HOD or directly to the whistleblowing authorized officers.
- d) Further details can be referred to the Whistleblowing Policy.

#### 7.10 Record Keeping

- a) Financial records must be kept for seven years as per audit requirements and have in place appropriate internal controls as evidence of the business reason for making and receiving payments from any parties.
- b) All hospitality, gifts or expenses made to third parties must be declared in accordance with the company's policy and specifically, record the reason for such expenditure as stipulated in the No Gift Policy.
- c) Employees shall further ensure that all expense claims shall comply with the terms and conditions as per Accounting Policies and Financial Authority Limit.
- d) No record shall be kept "off-book" to facilitate or conceal improper payments.

### 8 NON-COMPLIANCE

- a) Employees who are found to have committed an act which is contrary to this policy may be liable to disciplinary action as per HR Policy.
- b) Under severe cases, any violation of the law shall be reported to the authorities, i.e. Police or MACC. Always seek guidance from human resource, legal or governance departments prior to reporting.

### 9 REPORTING

- a) Report to Top Management on a quarterly basis about bribery, fraud and corruption-related issues or changes, including the results of related investigations, or as and when required.
- b) The adequacy and effectiveness of the anti-bribery and anti-corruption management system should be assessed on a continual and regular basis in line with the Policy Management Framework.