



# **GREENTRONICS**

***GREENTRONICS TECHNOLOGY BERHAD***  
***(Formerly known as Mpire Global Berhad)***

## **ANTI-BRIBERY AND CORRUPTION POLICY**

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**This document is to be used solely for internal purposes of  
Greentronics Technology Berhad  
and its group of companies.**

## Table of Contents

1. DEFINITIONS.....	2
2. INTRODUCTION .....	4
3. ANTI-BRIBERY AND CORRUPTION COMMITMENT .....	4
4. OBJECTIVE .....	4
5. SCOPE .....	4
6. REFERENCES .....	5
7. ANTI-BRIBERY AND CORRUPTION POLICY .....	5
8. RECOGNITION OF LOCAL LEGISLATION .....	5
9. GIFTS, ENTERTAINMENT AND HOSPITALITY .....	6
10. DONATIONS AND SPONSORSHIPS .....	7
11. CORPORATE RESPONSIBILITY .....	7
12. FACILITATION PAYMENTS.....	8
13. SUPPORT LETTERS.....	8
14. RECRUITMENT, PROMOTION AND SUPPORT OF PERSONNEL .....	8
15. BUSINESS ASSOCIATES.....	8
16. DEALINGS WITH PUBLIC OFFICIALS.....	9
17. RESPONSIBILITIES OF GREENTRONICS PERSONNEL.....	9
18. CONFLICT OF INTEREST.....	11
19. GREENTRONICS PERSONNEL’S DECLARATION.....	11
20. ANTI-BRIBERY AND CORRUPTION COMPLIANCE FUNCTION .....	11
21. RECORD-KEEPING .....	12
22. TRAINING AND COMMUNICATION .....	12
23. REPORTING OF POLICY VIOLATIONS .....	12
24. AUDIT AND COMPLIANCE .....	13
25. SANCTIONS FOR NON-COMPLIANCE .....	13
26. SYSTEMATIC REVIEW, MONITORING AND CONTINUOUS IMPROVEMENT .....	13
27. RESPONSIBILITY FOR THE POLICY .....	14
Appendix A - Sample of Declaration Form by Business Associate Acting on Behalf of GREENTRONICS ..	15
Appendix B - Sample of Declaration Form by GREENTRONICS Personnel.....	16

## 1. DEFINITIONS

“**ARMC**” means the Audit and Risk Management Committee of GREENTRONICS.

“**ABC Policy**” or “**Policy**” means Anti-Bribery and Corruption Policy of GREENTRONICS.

“**ABC Register**” means Anti-Bribery and Corruption Register.

“**Board of Directors**” means Board of Directors of GREENTRONICS and its subsidiaries.

“**Bribery & Corruption**” means any action which would be considered as an offence of giving or receiving ‘gratification’ under the MACCA. In practice, this means offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person who is in a position of trust within an organization.

Bribery may be ‘outbound’, where someone acting on behalf of GREENTRONICS attempts to influence the actions of someone external, such as a government official or client decision-maker. It may also be ‘inbound’, where an external party is attempting to influence someone within GREENTRONICS such as a senior decision-maker or someone with access to confidential information.

“**Business Associate**” means an external party with whom GREENTRONICS has, or plans to establish, some form of business relationship. This may include clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors.

“**Business Associate Acting on Behalf of GREENTRONICS**” means Business Associate authorized by GREENTRONICS to act on its behalf when dealing with another party.

“**Employees**” means all individuals directly contracted to the Company on an employment basis, including permanent and temporary employees.

“**Gratification**” is defined in the MACCA to mean the following:

- (a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
- (b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- (c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- (d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- (e) any forbearance to demand any money or money’s worth or valuable thing;

- (f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
- (g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).

**"Conflict of Interest"** means when a person's own interests either influence or have the potential to influence, or are perceived to influence their decision making at GREENTRONICS.

**"Controlled Organization"** means an organization where GREENTRONICS has the decision-making power over that organization such that it has the right to control the Board of Directors and/or appoint and remove the Management and/or holds more than 50% of the issued share capital and/or control more than 50% of the voting power of that organization. It could be where GREENTRONICS holds less than 50% of the voting power but is the largest shareholder that has the right to appoint or remove the Management of a joint venture company.

**"Corporate Gift"** means something given from one organisation to another, with the appointed representatives of each organisation giving and accepting the gift. Corporate gifts may also be promotional items given out equally to the general public at events, trade shows and exhibitions as a part of building GREENTRONICS's brand. The gifts are given transparently and openly, with the implicit or explicit approval of all parties involved. Corporate gifts normally bear GREENTRONICS's name and logo. Examples of corporate gifts include items such as diaries, table calendars, pens, notepads and plaques. For value above RM1,000.00, it must be declared to Finance/ HR Department;

**"Donation & Sponsorship"** means charitable contributions and sponsorship payments made to support the community. Examples include sponsorship of educational events, supporting non-profit organization, and other social causes.

**"Exposed Position"** means a staff position identified as vulnerable to bribery through a risk assessment. Such positions may include any role involving: procurement or contract management; relations with government officials or government departments; sales; positions where negotiation with an external party is required; or other positions which GREENTRONICS has identified as vulnerable to bribery.

**"Hamper"** is given or received as a customary practice during the festive seasons. For value above RM1,000.00, it must be declared to Finance/ HR Department.

**"Hospitality"** means the considerate care of guests, which may include refreshments, accommodation and entertainment at a restaurant, hotel, club, resort, convention, concert, sporting event or other venue such as offices, with or without the personal presence of the host. Provision of travel may also be included, as may other services such as provision of guides, attendants and escorts; use of facilities such as a spa, golf course or ski resort with equipment included.

**"Finance/ HR Department"** means Finance and/ or Human Resources Department.

**"MACCA"** means Malaysian Anti-Corruption Commission Act 2009.

“**Top Management**” means any of GREENTRONICS’s Executive Directors and Key Senior Management, individually or collectively.

“**GREENTRONICS Personnel**” means collectively, Board of Directors and Employees of GREENTRONICS Group.

“**GREENTRONICS**” or “**the Company**” means the Greentronics Technology Berhad.

“**GREENTRONICS Group**” means GREENTRONICS and its subsidiaries.

## 2. INTRODUCTION

The ABC Policy has been developed to express GREENTRONICS’s commitment of having a clear and unambiguous policy statement on GREENTRONICS’s position regarding bribery and corruption forms the cornerstone of an effective integrity management system. The Policy should thus be read in conjunction with GREENTRONICS’s various policies and guidelines in enforcing and stringent the anti-bribery and anti-corruption practices.

## 3. ANTI-BRIBERY AND CORRUPTION COMMITMENT

GREENTRONICS Group are committed to conducting its business in accordance with all applicable laws, rules and regulations, highest ethical standards and integrity to avoid practices of bribery and corruption of all forms in GREENTRONICS Group’s daily management and operations.

GREENTRONICS Group has adopted a zero-tolerance approach against all forms of bribery and corruption. Employees who refuse to pay bribes or participate in acts of corruption will not be penalised even if such refusal may result in losing business.

The Policy leverages on the values and core principles set out in the Code of Conduct. Full compliance to the spirit is mandatory and should be maintained using a principle-based approach.

## 4. OBJECTIVE

The ABC Policy is to provide guidance to GREENTRONICS’s Board of Directors, Employees and/or any Business Associates (as defined under Section 1 of this Policy) concerning how to deal with bribery and corruption and related issues that may arise in the course of business. It reiterates GREENTRONICS’s commitment to full compliance by its Board of Directors, Employees and Business Associates with the MACCA (as defined under Section 1 of this Policy) and the Malaysian Anti-Corruption Commission (Amendment) Act 2018 and any other local anti-bribery or anti-corruption laws that may be applicable. This Policy complements and should be read in conjunction with our Code of Conduct and our Whistleblowing Policy, copies of which can be obtained from our website at <https://www.greentronics.my>.

## 5. SCOPE

This Policy is applicable to GREENTRONICS, its Controlled Organization, Board of Directors, Employees and Business Associate Acting on Behalf of GREENTRONICS (as defined under Section 1 of this Policy).

Joint-venture companies in which GREENTRONICS has non-controlling interest or co-venture and associated companies are encouraged to adopt these or similar principles. Other external providers are also expected to comply with the Policy in relation to all work conducted with GREENTRONICS.

## 6. REFERENCES

- (1) Code of Conduct
- (2) Employees Handbook
- (3) Whistleblowing Policy

## 7. ANTI-BRIBERY AND CORRUPTION POLICY

- i. Bribery and corruption in all forms are prohibited.
- ii. Bribery and corruption may take the form of anything of value, such as money, goods, services, property, privilege, employment position or preferential treatment.
- iii. GREENTRONICS Personnel and Business Associate Acting on Behalf of GREENTRONICS shall not therefore, whether directly or indirectly, offer, give, receive or solicit any item of value, in the attempt to illicitly influence the decisions or actions of a person in a position of trust within an organisation, either for the intended benefit of GREENTRONICS or the persons involved in the transaction.
- iv. The Policy applies equally to its business dealings with commercial (private sector) and Government (public sector) entities, and includes their directors, personnel, agents and other appointed representatives. Even the possible appearance of bribery or corruption is to be avoided, in particular when dealing with Government officials.
- v. The Policy applies to all countries worldwide, without exception and without regard to regional customs, local practices or competitive conditions.
- vi. No employee or external party shall suffer demotion, penalty or other adverse consequences in retaliation for refusing to pay or receive bribes or participate in other illicit behaviour. All GREENTRONICS Personnel are reminded that he/she will be subject to stern disciplinary action, including dismissal as well as civil and criminal liability if he/she is found in violation of this Policy.
- vii. GREENTRONICS is also committed to conducting reasonable due diligence checks on its prospective personnel, particularly when it relates to appointment to position where a more than minor bribery or corruption risk has been identified.

## 8. RECOGNITION OF LOCAL LEGISLATION

GREENTRONICS is committed to conducting its business ethically and in compliance with all applicable laws and regulations where it does business.

These mandatory laws include, but are not limited to, the Malaysian Penal Code (and its amendments), the MACCA (and its amendments), and the Companies Act 2016. These laws prohibit bribery and acts of corruption, and mandate that companies shall establish and maintain accurate books and records and sufficient internal controls.

In cases where there is a conflict between mandatory laws and the principles contained in this and other policies, the Malaysian laws shall prevail.

GREENTRONICS recognizes that local laws for GREENTRONICS's businesses outside Malaysia, if any, may, in some instances, be less restrictive than the principles set forth in this Policy. GREENTRONICS and its Business Associates will, nevertheless, be expected to comply with the principles set out in this Policy in respect of conduct in all jurisdictions where GREENTRONICS operates, even where compliance with this Policy prohibits conduct that may otherwise be permitted by the local law of a particular jurisdiction. The principles and best practices standards set out in this Policy will be the prevailing criteria.

## **9. GIFTS, ENTERTAINMENT AND HOSPITALITY**

- i. GREENTRONICS Personnel is prohibited from receiving or asking for (soliciting)/ giving gifts from/to external parties. Under no circumstances may GREENTRONICS Personnel accept/ offers gifts in the form of cash or cash equivalent, including gifts, certificates, loans, commissions, coupons, discounts or any other related forms.
- ii. The form of gift giving/acceptance allowed to/from external parties is Corporate Gift and/or Hamper only. For value above RM1,000.00, it must be declared to Finance/ HR Department.
- iii. Any other gift giving/acceptance or event of entertainment or hospitality is subject to approval from Top Management (upon the recommendation of Head of Department) and must fulfil the following conditions:
  - a) They are limited, customary and lawful under the circumstances;
  - b) They do not have or are perceived not to have (by either the receiver or the giver), any effect on actions or decisions;
  - c) There must be no expectation of any specific favour or improper advantages from/to the intended recipients/givers;
  - d) The independent business judgment of the intended recipients must not be affected;
  - e) There must not be any corrupt / criminal intent involved;
  - f) The receiving/giving out of the gift and hospitality must be done in an open and transparent manner;
  - g) The value and nature of the expenditure is not disproportionate to the occasion;

- h) The giving or receiving of gifts, entertainment and hospitality is not overly frequent between the giver and the recipient; and
- i) To declare to the Finance/ HR Department, irregardless of the amount. The expense will be fully documented including purpose, approvals given and value.

## 10. DONATIONS AND SPONSORSHIPS

- i. Donations and sponsorships are permitted with the approval from the Top Management (upon the recommendation of Head of Department) but GREENTRONICS prohibits the giving and receiving of donations and sponsorships to influence business decisions. Proper record keeping should be maintained and be declared to Finance/ HR Department for recording into the ABC Register, irregardless of the amount paid.
- ii. GREENTRONICS Personnel needs to be certain that donations to local or foreign-based charities or beneficiaries are not disguised illegal payments or bribes to government officials, and must ensure that the charity does not act as a conduit to fund illegal activities in violation of international antimoney laundering, anti-terrorism and other applicable laws.
- iii. Generally, all sponsorships and donations must comply with the following:
  - ensure such contributions are allowed by applicable laws;
  - obtain all the necessary authorisations;
  - be made to well established entities having an adequate organisational structure to guarantee proper administration of the funds;
  - be accurately stated in the company's accounting books and records; and
  - not to be used as a means to cover up an illegal payment or bribery.
- iv. GREENTRONICS does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office. 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 GREENTRONICS 's accounting records. Under no circumstances, however, will any employee be compensated or reimbursed in any way by the Company for a personal political contribution.

## 11. CORPORATE RESPONSIBILITY

As part of GREENTRONICS's commitment to corporate responsibility and development, as a general principle, GREENTRONICS provides such assistance in appropriate circumstances and in an appropriate manner. However, such requests must be carefully examined for legitimacy and not be made to improperly influence a business outcome.

The proposed recipient of assistance must be a legitimate organization and appropriate due diligence must be conducted. Even requests determined to be legitimate must be carefully structured to ensure that the benefits reach their intended recipients. If you are in any doubt as to whether a charitable contribution or social benefit is appropriate, consult Finance/ HR Department for assistance.

## 12. FACILITATION PAYMENTS

GREENTRONICS adopts a strict policy of disallowing the use of facilitation payments in its business. Facilitation payment is a payment or other provision made personally to an individual in control of a process or decision. It is given to secure or expedite the performance of a routine or administrative duty or function.

GREENTRONICS Personnel shall decline to make the payment and report to their Head of Department immediately when they encounter any requests for a facilitation payment. In addition, if a payment has been accidentally made and GREENTRONICS Personnel is unsure of the nature, the Head of Department must be notified immediately who shall then report immediately to the Top Management, irregardless of the amount paid.

Only in the event that an Employee's security is at stake, it is permitted to make the payment. The Employee must immediately report the incident to their Head of Department who shall then report immediately to the Top Management, irregardless of the amount paid.

The facilitation payments made above shall, upon the Top Management's notation then be reported by the Head of Department to the Finance/ HR Department for recording into the ABC Register, irregardless of the amount paid.

## 13. SUPPORT LETTERS

GREENTRONICS awards contracts and employment positions purely on a merit basis. Therefore, support letters in all forms shall not be recognized as part of the business decision-making process.

## 14. RECRUITMENT, PROMOTION AND SUPPORT OF PERSONNEL

GREENTRONICS recognizes the value of integrity in its Personnel and Business Associates. GREENTRONICS's recruitment, training, performance evaluation, remuneration, recognition and promotion for all GREENTRONICS Personnel, including Management, shall be designed and regularly updated to recognize integrity.

GREENTRONICS does not offer employment to prospective personnel in return for their improper favour to GREENTRONICS Group in a previous role.

## 15. BUSINESS ASSOCIATES

All Business Associates Acting on Behalf of GREENTRONICS such as consultants, advisors, and agents are required to comply with the Policy, the Code of Conduct and all other policies as it relates to them. They shall make a declaration to abide the Policy and the Code of Conduct which must be kept by the custodian of the process for the duration of their contract. A sample copy of the declaration is enclosed in Appendix A of the Policy.

In circumstances where GREENTRONICS retains controlling interest over an entity, such as in certain joint venture agreement, such entity is required to adhere to the Policy and the Code of Conduct. Where GREENTRONICS does not have controlling interest over the entity, such entity is encouraged to comply the same.

Reasonable due diligence should also be carried out with regards to any Business Associate intending to act on GREENTRONICS's behalf as an agent or in other representative role, to ensure that the Business Associate is not likely to commit an act of bribery or corruption in the course of its work with GREENTRONICS.

The extent of the due diligence should be based on a bribery and corruption risk assessment. Due diligence may include a search through relevant databases, checking for relationships with public officials, self-declaration, and documenting the reasons for choosing a Business Associate over another. The results of the due diligence process shall be documented and retained for the duration of the contract by the custodian of the process and produced on request.

GREENTRONICS may include standard clauses in all contracts with Business Associates enabling GREENTRONICS to terminate the contracts in the event that bribery or an act of corruption has been proven to occur. Additional clauses may also be included for Business Associate Acting on Behalf of GREENTRONICS where a more than minor bribery risk has been identified.

## 16. DEALINGS WITH PUBLIC OFFICIALS

GREENTRONICS strives to build transparent and fair relationships with government agencies and public officials. GREENTRONICS Personnel and Business Associates must exercise caution when dealing with public officials and appropriate action must be taken to comply with applicable laws and regulations of bribery and corruption in Malaysia and in all countries in which the GREENTRONICS Group operates.

## 17. RESPONSIBILITIES OF GREENTRONICS PERSONNEL

- i. All GREENTRONICS Personnel are required to carry out those responsibilities and obligations relating to GREENTRONICS's anti-bribery and corruption stance, alongside those already in existence, which includes the following:
  - a) Be familiar with applicable requirements and directives of the Policy and communicate them to subordinates;
  - b) Promptly record all transactions and payments in GREENTRONICS's books and records accurately and with reasonable detail;
  - c) Refer to Finance/ HR Department if any question about the Policy arises or if there is a lack of clarity about the required action in a particular situation;
  - d) Always raise suspicious transactions and other "red flags" (indicators of bribery or corruption) to immediate superiors for guidance on the next course of action;
  - e) Be alert to indications or evidence of possible violations of the Policy;
  - f) Promptly report violations or suspected violations through appropriate channels;
  - g) Attend the required anti-bribery and corruption training according to their position; and

- h) Not to misuse their position or GREENTRONICS's name for personal advantage.
- ii. When dealing with Business Associates, all GREENTRONICS Personnel shall not:
  - a) Express unexplained or unjustifiable preference for certain parties;
  - b) Make any attempt at dishonestly influencing their decisions by offering, promising or conferring advantage;
  - c) Exert improper influence to obtain benefit from them; and
  - d) Directly or indirectly offer or make promise of corrupt payments, in cash or in kind for a specific favour or improper advantage from them.
- iii. During an active or anticipated procurement or tender exercise, GREENTRONICS Personnel participating in the exercise in any way whatsoever, shall not:
  - a) Receive gifts or hospitality or any kind from any external party participating, planning to participate, or expected to participate, in the procurement or tender exercise;
  - b) Provide anything other than a Corporate Gift and/or Hamper to any external/third party related to the exercise;
  - c) Be involved in any discussions regarding business or employment opportunities, for personal benefit or for the benefit of a Business Associate;
  - d) Abuse the decision-making and other delegated powers given by the Top Management; and
  - e) Bypass normal procurement or tender process and procedure.
- iv. When dealing with external parties in a position to make a decision for GREENTRONICS's benefit (such as a Government official or client), GREENTRONICS Personnel shall not:
  - a) Offer, promise or make any attempt at dishonestly influencing the person's decision by directly or indirectly offering or making promise of corrupt payments, in cash or in kind;
  - b) Be involved in any discussions regarding business or employment opportunities, for their own personal benefit or for the benefit of the external party;
  - c) Otherwise abuse the decision-making and other delegated powers given by the Top Management, in order to illicitly secure an outcome which would be to the commercial advantage to themselves and/or GREENTRONICS; and
  - d) Exert improper influence to obtain personal benefits from them.
- v. GREENTRONICS Group's heads of departments have responsibility to ensure that all departments or functions comply with the Policy. They also must ensure that their subordinates attend the

relevant training/briefing organised by the Finance/ HR Department or professional bodies or statutory bodies in relation to the Policy and anti-corruption and bribery practices.

## **18. CONFLICT OF INTEREST**

Conflict of interest arises in situation where there is a personal interest that could be considered to have potential interference with objectivity in performing duties or exercising judgment on behalf of GREENTRONICS. All GREENTRONICS Personnel should avoid situations in which personal interest could conflict with their professional obligations or duties. GREENTRONICS information available to them, for personal gain or to GREENTRONICS's disadvantage.

In situation where a conflict does occur, GREENTRONICS Personnel is required to declare the matter as per the Employees' Handbook.

## **19. GREENTRONICS PERSONNEL'S DECLARATION**

All GREENTRONICS Personnel shall declare in writing that they have read, understood and will abide by the Policy and the Code of Conduct. A copy of this declaration shall be documented and retained by the Finance/ HR Department for the duration of the Personnel's employment. A sample declaration is enclosed in Appendix B of the Policy.

GREENTRONICS reserves the right to request information regarding the Personnel's assets in the event that the person is implicated in any bribery and corruption-related accusation or incident.

## **20. ANTI-BRIBERY AND CORRUPTION COMPLIANCE FUNCTION**

The Finance/ HR Department shall perform the following functions to act effectively against bribery and corruption:

- a) Keep and retain GREENTRONICS Personnel's declaration for the duration of their employment in GREENTRONICS pursuant to Section 22 of this Policy;
- b) Organize the relevant training/briefing regarding anti-bribery and corruption, integrity and ethics, to all GREENTRONICS Personnel pursuant and maintain their attendance records;
- c) Provide advice and guidance to GREENTRONICS Personnel on the Policy and issues relating to bribery and corruption;
- d) Take appropriate steps to ensure the recording of all forms of gifts, entertainment, hospitality, donations and sponsorships, accepted or offered and facilitation payments;
- e) Report on any non-compliance of the Policy by GREENTRONICS Personnel and recommend the appropriate action to be taken to the Top management and the ARMC pursuant to Section 25 of this Policy; and

GREENTRONICS (through the outsourced Internal Auditor) shall conduct regular risk assessments to identify the bribery and corruption risks affecting the business, set anti-bribery and corruption objectives, and assess the effectiveness of the controls in achieving those objectives.

## 21. RECORD-KEEPING

Proper and complete records be maintained of all payments made to or receive from third parties in the usual course of business as these would serve as evidence that such payments were bona fide, and not linked to corrupt and/or unethical conduct. All accounts, invoices, documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with accuracy and completeness.

GREENTRONICS Personnel must declare all forms of gifts, entertainment, hospitality, donations and sponsorships, accepted or offered and facilitation payments, and submit the details including reasons for acceptance or offer to the Finance/ HR Department for recording into the ABC Register which will be subjected to internal audit review.

GREENTRONICS Personnel must ensure that all expense claims relating to hospitality, gifts or expenses incurred to Business Associates and/or any person are submitted in accordance with the Company's applicable policy and specifically record the reason for such expenditure. GREENTRONICS Personnel shall further ensure that all expense claims shall comply with the terms and conditions of this Policy.

## 22. TRAINING AND COMMUNICATION

GREENTRONICS shall conduct an awareness programme for all its Personnel and Business Associate Acting on Behalf of GREENTRONICS on GREENTRONICS's position regarding the Policy and Code of Conduct.

Training/briefing and communication of the Policy and Code of Conduct should be provided by the Finance/ HR Department to all new GREENTRONICS Personnel upon their joining. Training shall also be provided to all existing Personnel on a regular basis, in accordance with the anticipated level of bribery and corruption risk related to their positions.

Records pertaining to training/briefing of GREENTRONICS Personnel and Business Associate Acting on Behalf of GREENTRONICS are kept and maintained by the Finance/ HR Department for reference and monitoring.

## 23. REPORTING OF POLICY VIOLATIONS

- i. Suitable reporting channels shall be established and maintained for receiving information regarding violations of the Policy, and other matters of integrity provided in good faith by GREENTRONICS Personnel and/or external parties.
- ii. Personnel who, in the course of their activities relating to their employment at GREENTRONICS, encounter actual or suspected violations of the Policy are required to report their concerns using the reporting channels stated in GREENTRONICS's Whistleblowing Policy.
- iii. Reports made in good faith, either anonymously or otherwise, shall be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation.

- iv. Retaliation in any form against GREENTRONICS Personnel where the person has, in good faith, reported a violation or possible violation of the Policy is strictly prohibited. Any GREENTRONICS Personnel found to have deliberately acted against the interests of a person who has in good faith reported a violation or possible violation of the Policy shall be subjected to disciplinary proceedings including demotion, suspension, dismissal or other actions (including legal action) which GREENTRONICS may pursue.
- v. Any GREENTRONICS Personnel who fails to report known or suspected violations may be subject to disciplinary action including termination of employment. In Malaysia, any person who knows and fails to report an act of giving and offering of bribes is committing an offence under Section 25 (1) and (2) of the MACCA.

#### 24. AUDIT AND COMPLIANCE

Regular audits shall be conducted to ensure compliance to the Policy. Such audits may be conducted internally by GREENTRONICS or by an external party. Audit documentation should include performance improvement action plans.

#### 25. SANCTIONS FOR NON-COMPLIANCE

Non-compliance as identified by the audit and any risk areas identified through this and other means should be reported through the Finance/ HR Department to the Top Management and the ARMC in a timely manner in accordance with the level of risk identified.

GREENTRONICS regards bribery and acts of corruption as serious matters and will apply penalties in the event of non-compliance to the Policy. For GREENTRONICS Personnel (contracted on an employment basis), noncompliance may lead to disciplinary action, up to and including termination of employment.

For external parties, non-compliance may lead to penalties including termination of contract.

Further, legal action may also be taken in the event that GREENTRONICS's interests have been harmed as the result of non-compliance by individuals and organizations.

#### 26. SYSTEMATIC REVIEW, MONITORING AND CONTINUOUS IMPROVEMENT

GREENTRONICS shall monitor the legal and regulatory regimes where it operates and any changes to GREENTRONICS's business environment and risks and identify any opportunities for improvement. A report should be submitted to the Top Management and the ARMC on a regular basis for the appropriate action to be taken.

Regular assessments should be carried out to ensure the scope, policies, procedures and controls of the anti-bribery and corruption practices are match the bribery and corruption related risks faced by GREENTRONICS, and in any event, at least once every three (3) years and any amendments to the Policy will be subjected to the review and recommendation by the ARMC and approval of the Board of Directors of GREENTRONICS.

GREENTRONICS endeavours to impact the business environment where it operates. This includes extending its integrity programme to non-controlled Business Associates such as suppliers and

contractors, seeking to work with companies who have a similar commitment and supporting initiatives in the private and public sectors which are likely to improve the integrity of its operating environment.

## 27. **RESPONSIBILITY FOR THE POLICY**

This Policy is reviewed and approved by the ARMC and Board of Directors and oversight of this Policy has been delegated to the ARMC, which monitors the effectiveness of and compliance with this Policy.

The Board of Directors and the Top Management team of GREENTRONICS set the tone at the top providing leadership and support for the Policy and take responsibility for its effectiveness within their business units. GREENTRONICS's Top Management is responsible for the implementation and all communication and training activities to ensure every employee understood and complied with this Policy.

**Appendix A - Sample of Declaration Form by Business Associate Acting on Behalf of GREENTRONICS**

I/We, \_\_\_\_\_, hereby declare that I/we have read and understood GREENTRONICS's Anti-Bribery and Corruption Policy ("the Policy") and the Code of Conduct ("the Code") and will abide by the requirements and provisions set out in the Policy and the Code as and when we are acting on behalf of GREENTRONICS.

Signature :

.....

Full Name :

.....

NRIC No. :

.....

Company's Stamp :

.....

Date :

.....

**Appendix B - Sample of Declaration Form by GREENTRONICS Personnel**

I, \_\_\_\_\_, hereby declare that I have read and understood GREENTRONICS's Anti-Bribery and Corruption Policy ("the Policy") and the Code of Conduct ("the Code") and will abide by the requirements and provisions set out in the Policy and the Code.

GREENTRONICS reserves the right to request information regarding my assets in the event that I am implicated in any bribery and corruption-related accusation or incident.

Signature : \_\_\_\_\_

Full Name : \_\_\_\_\_

NRIC No. : \_\_\_\_\_

Date : \_\_\_\_\_