

	FARM PRICE HOLDINGS BERHAD	Doc No.	FPSB-POL-02
	ANTI-BRIBERY AND CORRUPTION POLICY	Rev No.	00

(Registration No.: 202301019404 (1513326-T))
(Incorporated in Malaysia)

FARM PRICE HOLDINGS BERHAD

ANTI-BRIBERY AND CORRUPTION POLICY

Prepared by:	Reviewed by:	Approved by:
<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name: Nurul Fatina Designation: QA & Compliance	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name: Liew Tsuey Er Designation: Executive Director	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Name: Tiong Lee Chian Designation: Managing Director

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1. GIFTS, ENTERTAINMENT, AND CORPORATE HOSPITALITY

The Company has adopted a ‘No Gift’ Policy whereby, subject only to specified exceptions, all employees and associates acting for or on behalf of the Company are prohibited from, directly or indirectly receiving and/or providing gifts.

It is the responsibility of Employees and Directors of the Group to inform external parties involved in any business dealing with the Company and its subsidiaries that our Group practices a ‘No Gift Policy’ and to request the external party for their understanding and attentiveness for and adherence to this policy.

Gifts, entertainment, or corporate hospitality which may influence or be perceived to be able to influence business decisions or outcomes may be construed as bribes and they must not be given or received by the Group’s Directors, Employees, suppliers, or Business Associates when in the conduct of the Group’s business. Similarly, gifts, entertainment, or corporate hospitality shall be avoided where a conflict-of-interest situation is present. Generally, the Group’s practice for giving and receiving gifts are limited to the following situations (in the following situations, an “Organization” may refer to the Group or an external party):-

- (a) gifts given by the Group to Employees and Directors and/ or their family members in relation to an internal or externally recognized function, event, or celebration of the Group (e.g. in recognition of an employee’s/ director’s service to the Group);
- (b) exchange of gifts at organization-to-organization level (e.g. gifts exchanged between companies as part of an official company visit/ courtesy call and thereafter said gift is treated as company property);
- (c) gifts to external institutions or individuals in relation to an Organization’s official functions, events and celebrations which is commonly given in public (e.g. commemorative gifts or door gifts offered to all guests attending the event);
- (d) token or corporate gifts of nominal value, normally bearing a corporate logo (e.g. t-shirts, pens, diaries, calendars and other small promotional items), that are given out equally to members of the public, delegates, customers, partners, or stakeholders attending events such as conferences, exhibitions, training, trade shows, etc. and deemed as part of an Organization’s brand building or promotional activities;
- (e) gifts to external parties who have no business dealings with the Group (e.g. monetary gifts or gifts in-kind to charitable organizations);
- (f) token or corporate gifts must not affect the independent business judgement of the intended recipients;
- (g) There must not be any corrupt/criminal intent involved for giving or receiving the gifts;

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- (h) Nominated employees, employees on duty and directors who are eligible to participate in the Company inspection trips and/or incentive tours (local or overseas) and the expenses are sponsored by the Group;
- (i) Hotel accommodation in conjunction with the Company's events and trips whereby the expenses are fully sponsored by the Company and its subsidiaries; and
- (j) Monetary gifts such as "Ang-pow" red packet are not allowed to be received from customers or business associates during festive occasions (e.g. Chinese New Year, Hari Raya Aidilfitri and Deepavali).

The Group's Employees are not allowed to provide gifts to third parties or customers unless they obtain prior approval from the Management.

Apart from the above-mentioned situations, the Group's Directors and Employees are discouraged from receiving gifts from parties who have business dealings with the Group. If such situations are unavoidable, established policies and procedures of the Group in relation to receiving gifts must be complied with. Notwithstanding, in no circumstances may gifts in the form of cash or cash equivalent be accepted.

2. DONATIONS, SPONSORSHIPS, AND POLITICAL CONTRIBUTION

The Group does not make donations or contributions to political parties, nor does it sponsor any political events. This, however, does not prohibit any individual from making donations or sponsorships under their personal capacity provided that the donations or sponsorships must not be associated with the Group.

All donations and sponsorship requests must be carefully examined for legitimacy and not be made to improperly influence a business outcome. All donations and sponsorship must seek approval from the Director (s).

3. PROCUREMENT PROCESS

The Group has established policies and procedures addressing the selection of suppliers and Business Associates. The selection of suppliers and Business Associates is based on merits such as quality, pricing, capability, track record, and experience, and it shall be in the best interest of the Group.

Due diligence forms part of the Group's selection of new suppliers and Business Associates and due diligence review may also be performed on existing suppliers and Business Associates from time to time.

Suppliers and Business Associates may be required to provide written acceptance and acknowledgment of the Group's applicable policies.

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4. FACILITATION PAYMENT

Facilitation payment is defined as payments made to secure or expedite the performance by a person performing a routine or administrative duty or function.

The Group prohibits accepting or obtaining, either directly or indirectly, facilitation payments from any person for the benefit of the employee himself/herself or for any other person. The reason underlying this prohibition is that facilitation payment is seen as a form of bribery and corruption.

All persons must not offer, promise, give, request, accept or receive anything which might reasonably be regarded as a facilitation payment. If the employees receive a request or offered facilitation payments, he/she must immediately report to HOD/Supervisor/Manager.

5. COMPLIANCE AND REPORTING A CONCERN

The Group takes combatting corruption and bribery very seriously. Any violation of this Policy will be regarded as a serious matter by the Group and is likely to result in a review of relationship, including disciplinary action, dismissal, or termination, consistent with applicable laws and regulations.

All the Group's Directors, Employees, suppliers, and Business Associates are required to be familiar with and comply with this Policy.

An Employee must notify his or her superior as soon as possible if he or she believes or suspects that a breach of this Policy has occurred or may occur. Alternatively, the Employee may raise his or her concerns through the Group's Whistle-Blowing Policy.

The Group's Directors, suppliers, and Business Associates or members of the public may also raise their concerns regarding any known breaches or suspected breaches of this Policy through the Group's Whistle-Blowing Policy, which is available on the Group's corporate website. Whistleblowers shall be accorded the protection as set out in the Whistle-Blowing Policy.

6. RECORD-KEEPING

The Group must keep financial records and have appropriate internal controls in place which will provide evidence and support for any legitimate payments to third parties. The Group must ensure all expenses claims relating to hospitality, gifts or entertainment incurred to third parties are submitted in accordance with the Group's relevant policies. All accounts, invoices, and other documents and records relating to dealings with third parties, such as customers, suppliers and business contacts, should be prepared and maintained with accuracy and completeness.

7. TRAINING AND COMMUNICATION

From time to time and as determined by the Group, Directors, Employees, suppliers, and Business Associates, especially those operating in areas that are exposed to high bribery risk, shall be

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provided with relevant training on how to implement and adhere to this Policy.

Our zero-tolerance approach to bribery and corruption must be communicated to all Directors, Employees, suppliers, and Business Associates at the outset of our relationship with them and as appropriate thereafter.

The Company recognizes the value of integrity in its Directors, Employees and Business Associates. The Company's recruitment, training, performance evaluation, remuneration, recognition and promotion for all the Company's Employees, including management, shall be designed and regularly updated to recognize integrity.

The Company does not offer employment to prospective personnel in return for their having improperly favored the Company in a previous role.

8. MONITORING AND REVIEW

All the Group's Directors, Employees, suppliers, and Business Associates are responsible for the success of this Policy and should ensure they use it to disclose any suspected unethical business practices or wrongdoing. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

9. REVIEW OF THIS POLICY

The Board shall review and assess the relevance and effectiveness of this Policy periodically to assess their effectiveness, and in any event, at least once every three (3) year, the Board deem necessary and/or require to ensure its relevance and effectiveness in keeping with the Group's changing business environment, administrative or operational needs as well as changes to legislations.

10. REVISION OF THIS POLICY

The provisions of this Policy can be amended and supplemented from time to time by a resolution of the Board.

END.