

**MULTI-USAGE HOLDINGS
BEHAD**

**Anti-Bribery and Corruption
Policy**

Date of Revision: 29 November 2024



	Title	Anti-Bribery and Corruption Policy		
	Ref No.	ABC-002	Version No.	2
	Effective Date	29-11-2024	Revision Date	29-11-2024

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Anti-Bribery and Corruption Policy

1. Introduction

Multi-Usage Holdings Berhad and its subsidiaries (collectively referred to as the "Group" or "MUH") are committed to conducting their business dealings with integrity and ethics. The Group practices a zero-tolerance approach against all forms of bribery and corruption, and upholds all applicable laws in relation to anti-bribery and corruption. To this end, MUH, its directors and employees will not engage or attempt to engage in any form of Bribery and Corruption either directly or indirectly.

The Anti-Bribery and Corruption Policy ("ABC Policy" or this Policy") provides guidance to employees on how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise in the course of business. This Policy is not intended to provide definitive answers to all situations regarding bribery and corruption. It is intended to provide employees with the basic principles on how the Group combats bribery and corruption in furtherance of the Group's commitment to lawful and ethical behavior at all times. This Policy should be read in conjunction with our Code of Conduct, Whistleblowing Policy, Employee Handbook and Malaysian Anti-Corruption Commission (Amendment) Act 2018 ("MACC Act"). Should there be any conflicts between this policy and applicable laws, the law shall prevail.

In the event of any uncertainty about whether a real, potential or apparent conflict has arisen or any queries on this Policy, immediate clarification must be consulted from the reporting manager, respective Heads of Division / Department, or Group Managing Director ("GMD").

This policy is available at the Group's website at www.muh.com.my

2. Scope and Applicability


This Policy is applicable to all employees, including those who are full time, probationary, contract and temporary employees (collectively referred to as "Employees") as well as Directors of the Group. It is also expected that contractors, sub-contractors, consultants, advisers, agents, outsourced personnel, vendors, representatives and other persons or entities performing work or services for or on behalf of the Group ("Business Associate") comply with this Policy when performing such work or services.

MUH is committed to ensuring that no director or employee suffers any detrimental or retaliatory actions as a result of refusing to take part in any bribery and corruption.

3. Definition

The following definitions and interpretations shall apply to this policy.

"Bribery" is defined as any action which would be considered as an offence of giving or receiving 'gratification' under MACC Act. 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 a position of trust within an organisation. Bribery may be 'outbound', where someone acting on behalf of the Group 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 the Group such as a decision-maker or someone with access to confidential information.

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“Corruption” is the dishonest act of abusing entrusted power for private gain. In addition, corruption may also include acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.

“Business Associate” means any external party whether an individual or an organisation, with whom MUH has established, or plans to establish any form of business relationship or dealings. This may include joint venture partners, consortium partners, outsourcing providers, consultants, advisers, contractors, subcontractors, suppliers, vendors, tenants, distributors, representatives, investors and intermediaries who perform works or services for or on behalf of MUH.

“Donations and Sponsorships” includes charitable contributions and sponsorship payments made to support the community or corporate activities and political donations. Examples include sponsorship of educational events, corporate social responsibility, supporting non-governmental organisations (“NGOs”), and other social causes;


“Entertainment / Hospitality Expenses” includes meals, drinks, lodging, travel or other expenses given to or received from people who have or who may have facilitated the creation of a business relationship with the Group. This include expenses incurred by a prospective client, customer or business partner. Expenses can be a legitimate contribution to achieving a business outcome and also includes attendance at social, cultural or sporting events.

“Facilitation payment” means a payment made with the intention to expedite, influence or secure the action of a routine, administrative or governmental duty that is performed by relevant parties.

“Gift” means any cash, shares, tickets, services, club memberships, travel facilities, vouchers, any form of commission, hampers, watch, jewellery, luxury pens, decorative items or any item of excessive value which the recipient is not expected to pay the fair value. Gift includes but not limited to corporate gifts/ promotional items such as diaries, table calendars, pens, notepads, umbrellas, shirts, fruits, flowers, mugs and plaques.

‘Gratification’ is defined in the MACC Act 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

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- 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).

4. Gifts, Hospitality and Entertainment


Employees, directors (Executive or Non-Executive), officers, their family members or any third party acting for or on behalf of MUH, must not directly or indirectly give, agree to give, offer, promise, or accept any gratification in the form of cash or cash equivalents, including but not limited to, kickbacks, gift cards, loans, commissions, vouchers, or huge discounts to/from any company or individual in expectation of an advantage, or with the intention to inappropriately influence the person(s) involved and the business judgements or decisions they may make.

However, the Group recognises that the exchange of business courtesies, such as modest gifts, hospitality and entertainment (including meals, invitations to attend promotional events or parties) particularly during festive periods is customary and legitimate to create goodwill, and/or strengthen business and commercial relationships. Such courtesies are allowed if they are not lavish, appropriate and reasonable in the light of accepted business practices of the relevant businesses that the Group operates in and is not intended to improperly influence the decisions of the person involved.

As a guiding principle, Directors and Employees may offer and receive gifts, hospitality and entertainment provided that such gift, hospitality and entertainment is appropriate, reasonable and acceptable in the normal course of business. When determining whether such gifts, hospitality or entertainment is permissible, Directors and Employees should take into account, considerations such as the intention and timing, transparency, frequency, compliance with the other party's policies and rules and the legality of such gift, hospitality and entertainment. All offers and acceptance of Gift, Hospitality and Entertainment shall be made in accordance to the Limits of Authority ("LOAs").

Gifts can be given or received during festive seasons or other ceremonial occasions, provided that the following conditions are fulfilled:

- (a) the items are reasonable and proportionate in the context of the business occasion;
- (b) the items have been spontaneously given;
- (c) the items have been given openly, not secretly;
- (d) the items have not been given to a party as part of a direct request for a business proposal or tender process;
- (e) the acceptance of the Gift is permitted by the recipient's organisation or employer;
- (f) the giving or receiving of gifts, entertainment and hospitality is not overly frequent between the giver and the recipient. and
- (g) they are not intended to possibly influence the decision or behavior of the recipient.

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Certain types of gifts, hospitality and entertainment are not permissible. As a guiding principle, the following gifts, hospitality and entertainment are strictly prohibited:

- (a) Any gift, hospitality or entertainment that is illegal or in breach of any laws, regulations or rules;
- (b) Any gift, hospitality or entertainment offered to a Government Official to facilitate or expedite a routine procedure;
- (c) Gifts, hospitality or entertainment involving parties currently engaged in a tender process should not be accepted unless expressly approved by the GMD;
- (d) Gifts made in cash or cash equivalent i.e. anything that can be easily converted to cash should not be accepted unless expressly approved by the GMD;
- (e) Any hospitality or entertainment that are sexually oriented;
- (f) Any gift, hospitality or entertainment that is a "quid pro quo", i.e. something offered in return for something else such as business advantage; and
- (g) Any gift, hospitality or entertainment that is paid for personally to avoid having to declare or seek approval for.

It is pertinent to bear in mind the broader context in which the gift, hospitality and/or entertainment is offered or received. Any gift, hospitality or entertainment that may appear or be perceived as influencing or compromising the judgment or objectiveness of the recipient shall not be offered or received. If Employees and/or Business Associates feel compelled to accept a Gift (for example if rejecting it would offend the person offering it or potentially cause harm to the business), they may accept the Gift but must disclose it to the GMD as soon as possible. The GMD will determine the treatment of the gift whether to:-

- Donate the gift to charity;
- Hold the gift for departmental display;
- Register it as a company property to be used publicly by all employees;
- Retain all the gifts and consume later as lucky draw items during company's event;
- Share with other employees in the department, or
- Permit the employee to keep it.


5. Donations, Sponsorships and CSR

Donations (including charitable contributions) and sponsorships made by the Group and person associated are philanthropic in nature or for the purpose of promoting the Group and must never be made with the intention to, or perceived to be able to, influence any business-related decisions or outcome. All donations and sponsorships must not be used as a means to cover up an illegal payment or bribery.

Employees, director and Business Associates of the MUH, acting on the Group's behalf shall not donate to or sponsor an event with the intention to obtain or retain a business-related decision or an advantage in the conduct of business on behalf or for the Group.

The Group shall not make any donation or sponsorship that comes with a direct or indirect suggestion, hint, inducement, understanding or implication that some expected or desirable outcome is required, or that is illegal or in breach of any applicable laws.

All donations or sponsorships and CSR projects shall be made in accordance to the LOAs and it is essential to obtain the approval from the GMD.

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6. Political Contributions

In principle, the Group does not make any financial or in-kind contribution to political parties, political party officials or candidates for political office, unless it is allowed under the relevant laws and regulations and the same must be made without expectation or promise of favourable treatment towards the Group. The authority to approve of such contributions lies with GMD or the Board.

7. Facilitation Payments

Directors, Employees and Business Associates are prohibited from, directly or through a third party, giving, receiving, or promising of facilitation payments of all kinds. Facilitation payments include unofficial and improper payments or benefits provided to secure or expedite a business-related outcome or decision for the Group. Facilitation payments may be seen as a bribe and they could be small in value and solicited by both the public and private sectors.

If the employees or business associates of MUH encounter a situation where a facilitation payment is sought, they must immediately report the request to GMD.

8. Business Rewards, Rebates, Kickbacks, Commissions, or Other Incentives

Doing business or establishing new business opportunities may involve the use of various promotional and marketing tools such as business rewards, rebates, kickbacks, discounts, or other incentives. That said, certain business rewards or incentives may be of questionable nature or worse, they may constitute a bribe formulated with the intention to obtain or retain an undue business advantage.


- (a) The Group does not provide business rewards, rebates, kickbacks, commissions, or other incentives which are questionable in nature or are contradictory with anti-corruption laws and regulations.
- (b) Business-related incentives of the Group must fulfil the following conditions:
 - i. is formally documented as part of the provider's (of the business incentive) incentive program or contract (e.g. rewards program or credit policy); and
 - ii. is applicable to all or its applicability is based on business-based parameters (e.g. applicable to all customers or applicable to customers exceeding certain order amount).

Employee, director and Business Associates acting on the Group's behalf shall uphold the above policy in the conduct of business on behalf or for the Group.

9. Training and Awareness

The Group is committed in communicating and providing adequate trainings and/or briefing in regards to this Policy and relevant laws and regulations to new employees.

The Group may, at any time, conduct certain trainings and other form of awareness programmes for Employees to refresh awareness of anti-bribery and anti-corruption measures, and to continuously promote integrity and ethics, if deemed necessary based on circumstantial requirements.

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10. Reporting on Policy Violations

Anyone who encounters actual or suspected violation of this Policy is required to report their concerns to any of the following reporting channels:

- (a) Group Managing Director: anghc6721@gmail.com
- (b) Audit & Risk Management Committee Chairman: addyng01@gmail.com
- (c) Letter: 12A.03, Menara Boustead Penang, 39 Jalan Sultan Ahmad Shah, 10050 Penang (Attention: Group Managing Director)

No Employee or Business Associates acting in good faith will suffer adverse consequences to his employment or retaliation for reporting or for refusing to engage in prohibited conduct, even if such refusal results in loss of business opportunities to the Group. Any report made will be treated confidentially.

11. Sanction for Non-Compliance

The Group adopts a zero-tolerance approach towards bribery and corruption and will not pay or receive bribes or corrupt gratification to or from anyone for any purpose. Directors, and Employees of the Group are expected to refuse to give or receive a bribe when solicited or offered one. The Group is committed to ensuring that no one will suffer demotion, penalty or other adverse consequences in retaliation for refusing to pay or receive bribes or participate in other illicit behaviour.

The Group regards bribery and acts of corruption as serious matters and will apply penalties in the event of non-compliance to this policy. For Employees, non-compliance may lead to disciplinary action, up to and including termination of employment.

For external parties including Business Associates, non-compliance may lead to penalties including termination of contract and suspension of ongoing contracts. Further legal action may also be taken in the event that the Group's interests have been harmed by the results on non-compliance by individuals and organisations.

The Group reserves the right to report any action or activity suspected to be in criminal nature to authorities.

12. Review of this Policy

This Policy shall be reviewed by the Company at least once in three (3) years and may be amended from time to time to improve the existing anti-bribery and corruption controls within the Group.

This Policy is approved by the Board of Directors of Multi-Usage Holdings Berhad on 29 November 2024.