



HUMAN RESOURCES DEPARTMENT

Doc. No	UMB/HRD/SOP/001	REVISION	0
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ANTI-BRIBERY POLICY

1. OBJECTIVE

United Malacca Berhad (UMB) together with its subsidiary companies and associates is committed to complying consistently with ethical values in its operations. This includes complying with all applicable laws and in particular Malaysian Anti-Corruption Act 2009.

UMB employees and any business associates or other associates must not offer or give a bribe, and must not request, or accept a bribe. To ensure compliance, UMB will improve and, where necessary, enact new procedures to discourage bribery-within the Group.

Any questions on bribes should be addressed to either the COO, CEO or Senior Independent Director Dato Dr Nik Ramlah Binti Nik Mahmood. Concerns may also be directed to UMB's whistle blowing channel (<https://unitedmalacca.com.my/corporate-profile/whistle-blowing-policy/>).

2. SCOPE

This policy applies to all employees in employment with UMB, its subsidiaries and associate companies as well as other business associates.

UMB employees are defined as:

- Employees, officers, and directors, including alternate directors of UMB, its subsidiaries and associates.

Business associates and other associates are defined as:

- Contractors, consultants, suppliers and their employees who have a contractual or business relationship with UMB. **Note – this phrase covers outsources**
- Government agencies and authorities

All contracts with UMB, its subsidiaries, business associates and other associates must include a clause prohibiting soliciting, offering or accepting bribes.

3. WHAT IS A BRIBE?

A bribe includes payment of money or granting non-monetary benefits; the latter includes refraining from taking a course of action against the seeker or initiating an endeavour that benefits the seeker.



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4. GUIDELINES TO MITIGATE TYPICAL BRIBERY

4.1 Gifts and Hospitality Activities

All gifts exceeding RM300 must be reported to one of the Company Secretaries within two weeks and details of the gifts should be recorded in a book. Gifts given in conjunction with Chinese New Year, Hari Raya, Deepavali and Christmas must comply with this requirement.

Gifts above RM300 are prohibited unless approved. Depending on the value, approval must be sought from Company Secretaries, Executive Committee (EXCO) or UMB Directors.

4.2 Charitable Donations or Social Contribution

All charitable donations in UMB's name must be approved either by EXCO, Chairperson or UMB Directors.

4.3 Offer Of Employment for an Individual or Relative

Employment should not be offered or given to an individual close to or a relative of a politician, a regulator or an influential person with whom UMB is a supplicant.

4.4 Sponsorship

Sponsorship in cash, goods or other benefits must be approved by Board of Directors.

Full-sponsored visits, whether within or outside Malaysia, by potential or existing suppliers or contractors must be approved by EXCO or Board of Directors.

4.5 Illegal Payments

Illegal payments include payments to individuals with the power to facilitate or accelerate official approvals for UMB. Also prohibited are non-recorded payments (popularly known as under-the-table payments) to the seeker as well as payments intended to circumvent taxes and/or anti-money-laundering regulations.

4.6 Use of business associates : agents / intermediaries / independent consultants

UMB will not use agents, intermediaries or consultants without the approval of EXCO or Board of Directors and without ensuring the services provided are appropriate for UMB's needs, payment commensurate with services provided and is paid only after delivery of satisfactory services.



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5. ACCOUNTABILITY AND RESPONSIBILITY

UMB Board of Directors will monitor the effectiveness of and compliance with the anti-bribery law and policy.

- 5.1 Management is responsible for the implementation of the policy and all communication and training activities in relation to policy to ensure that those reporting to them are made aware of, and understand this policy. Management is responsible for the internal controls spectrum related to this policy.
- 5.2 Heads of department should read this policy, paying close attention to a non-comprehensive list of potential red-flags listed on page 4.

6. REPORTING VIOLATIONS

If any employee is suspicious or is concerned about potential or actual bribery, the employee must report to Company Secretaries, EXCO or Board of Directors or utilise the whistle blowing channel.

7. INVESTIGATION

Bribery allegations should be supported by documents of proof and will be handed over to the Internal Audit department for investigation. The investigation report will be submitted to the Audit Committee.

The identity of a whistle blower filing a report will be treated as confidential and revealed only to board of UMB directors.

8. RISK MITIGATION PROCEDURES

Monitoring and preventing bribery includes the following:

- UMB Group shall regularly identify bribery risks in its business and implement procedures to prevent bribery.
- Regular and comprehensive audits to ensure compliance with anti-bribery laws are essential.
- UMB Group shall maintain financial accounts and documents, for seven years,



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9. POTENTIAL RED FLAGS

This list offers examples of prohibited behaviour and is not an exhaustive list.

Using an agent or consultant known as a conduit to government officials, politicians or individuals able to influence outcomes.

- Soliciting payments without providing appropriate services and without receipts or supporting documents.
- Requesting payment to third party accounts.
- Stipulating without adequate justification the use of certain contractors or suppliers.
- Requiring contributions to charitable organizations in return for “presumed” benefit to UMB.

10. POLICIES AND PROCEDURES TO ALIGN WITH THIS POLICY

- Sales
- Purchasing
- Tender Processes
- Fixed Assets
- Harvesting & Transporting and sales of FFB or CPO
- Estate Payroll
- Job Contracts
- Store Operations
- Estate Petty Cash
- Treasury Management