



United Malacca Berhad

Reg. No. 191001000010 (1319-V)

ANTI-BRIBERY POLICY

1. OBJECTIVE

United Malacca Berhad (UMB), together with its subsidiaries and associates, is committed to complying with high ethical values in its operations and dealings with third parties. This includes complying with all applicable laws in the countries it operates in and in particular the Malaysian Anti-Corruption Act 2009.

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

Any questions on bribes should be addressed to the 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 UMB employees including those working at its subsidiaries, associate companies and business associates.

UMB employees are defined as:

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

Business associates are defined as:

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

Bribery refers to the act of corruptly authorising, giving, agreeing to give, promising, offering, soliciting, receiving, or agreeing to receive any gratification.

4. WHAT IS GRATIFICATION?

- 4.1 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;
- 4.2 Any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- 4.3 Any payment, release, discharge or liquidation of any loan, obligation, or other liability, whether in whole or in part;
- 4.4 Any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction, or percentage;
- 4.5 Any forbearance to demand any money or money's worth;
- 4.6 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
- 4.7 Any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (4.1) to (4.6).

5. GUIDELINES TO MITIGATE TYPICAL BRIBERY

5.1 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.

Approval for gifts above RM300 must be sought by respective authorised person according to the allocated authorised limit.

5.2 Charitable Donations or Social Contribution

All charitable donations in UMB's name must be approved by respective authorised person according to the allocated authority limit.

5.3 Offer Of Employment

Employment should not be offered or given to an individual who is closely connected / related to a politician, a regulator or an influential person with whom UMB is a supplicant.

5.4 Sponsorship

Sponsorship in cash, goods or other benefits must be approved by respective authorised persons according to the allocated authority limit.

Full-sponsored visits, whether within or outside Malaysia, by potential or existing suppliers or contractors must be approved by respective authorised persons according to the allocated authority limit.

5.5 Illegal Payments

Illegal payments include payments to individuals with the power to facilitate or accelerate official approvals for UMB are prohibited. 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.

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

UMB will not use agents, intermediaries or consultants without the approval of Executive Director or Board of Directors and without ensuring the services provided are appropriate for UMB's needs and their fees commensurate with services provided.

6. ACCOUNTABILITY AND RESPONSIBILITY

6.1 Management is responsible for implementing this policy and for all communication and training activities in relation to this policy to ensure all employees are aware of, and understand this policy. Management is also responsible for instituting internal controls related to this policy.

6.2 Heads of Department should read this policy, paying close attention to potential red flags listed on Item No.10.

7. REPORTING VIOLATIONS

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

8. INVESTIGATION

Bribery allegations must be supported by documents that 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.

9. RISK MITIGATION PROCEDURES

Monitoring and preventing bribery include 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.
- UMB Group shall maintain financial accounts and documents for seven years.

10. POTENTIAL RED FLAGS

This list offers non-exhaustive examples of prohibited behaviour.

- 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 organisations in return for “presumed” benefit to UMB.

11. POLICIES AND PROCEDURES TO ALIGN WITH THIS POLICY

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