



IJM CORPORATION BERHAD

Anti-Bribery and Corruption Policy

POLICY STATEMENT

IJM Corporation Berhad [Company No. 198301008880 (104131-A)] ("**IJM**") and its subsidiaries (collectively referred to as the "**Company**") are committed to conducting their business in a legal and professional manner, with the highest standard of integrity and ethics. The Company practices a zero-tolerance approach against all forms of bribery and corruption, and upholds all applicable laws in relation to anti-bribery and corruption.

1. Overview

As part of the Company's commitment against all forms of bribery and corruption, the Company has established an anti-bribery and corruption system ("**ABCS**") to manage and consolidate various policies and processes in compliance with anti-bribery and corruption laws.

This anti-bribery and corruption policy ("**Policy**") forms part of the ABCS and aims to set out the parameters including the main principles, policies and guidelines, which the Company adopts in relation to anti-bribery and corruption.

2. Scope and Applicability

This Policy is applicable to all directors and employees of the Company including full time, permanent, part-time, employees on probation, trainees and interns, employees on secondment and on fixed-term contracts (collectively referred to as "**Employees**"). It is also expected that all third parties such as contractors, sub-contractors, consultants, agents, representatives and other persons or entities performing work or services for or on behalf of the Company ("**Third Parties**") comply with this Policy.

3. Definition of Bribery and Corruption

"Bribery" and "corruption" refer to the *offering, promising, giving, accepting or soliciting of an undue advantage or gratification of any value which can be financial or non-financial, directly or indirectly, and irrespective of location, in violation of applicable law as an inducement or reward for a person acting or refraining from acting in relation to the performance of the person's duties.*



4. Gifts, Hospitality and Entertainment

This Policy does not prohibit gifts, hospitality and entertainment offered and/or received in the normal course of business. However, it is important to note that certain gifts, hospitality and entertainment may cause improper influence, or appear or be perceived to cause improper influence. Such gifts, hospitality and entertainment may even be seen as a bribe and may tarnish the reputation of the Company.

As a guiding principle, all Employees may offer and receive gifts, hospitality and entertainment provided that such gifts, hospitality and entertainment are appropriate, reasonable (not excessive) and are usually acceptable in the normal course of business. When determining whether such gifts, hospitality or entertainment are permissible, all 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 gifts, hospitality and entertainment.

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

- (a) Gifts, hospitality and entertainment that are illegal or in breach of any laws, regulations or rules;
- (b) Gifts, hospitality and entertainment offered to a Public Official to facilitate or expedite a routine procedure;
- (c) Gifts, hospitality and entertainment involving parties currently engaged in a tender or competitive bidding process;
- (d) Gifts made in cash or cash equivalent i.e. anything that can be easily converted to cash;
- (e) Hospitality or entertainment that are sexually oriented;
- (f) Gifts, hospitality and entertainment provided or received that would be perceived as lavish or excessive or may tarnish the reputation of the Company;
- (g) Gifts, hospitality and entertainment that are a "*quid pro quo*", i.e., something offered in return for something else such as business advantage; and
- (h) Gifts, hospitality and entertainment that are 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 are offered or received. Gifts, hospitality and entertainment that may appear or be perceived as influencing or compromising the judgment or objectiveness of the recipient shall not be offered or received.

5. Charitable Donations and Sponsorships

Charitable donations and sponsorships, whether in kind services, knowledge, time, or direct financial contributions are allowed by the Company. However, the Company recognises that providing donations and sponsorships can pose a bribery risk as it involves payments to a third party without any tangible return and this may be used as a cover up or route for bribery.

As such, all Employees must make sure that charitable donations and sponsorships are not used as a scheme to circumvent any prohibitions on bribery. No charitable donations and sponsorships shall be offered or made without prior approval of the Head of Division or the CEO & Managing Director.



The Company 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 (e.g., to secure a business deal, to influence a business decision-making outcome), or that is illegal or in breach of any applicable laws.

6. Political Contributions

The Company may make contributions to political parties or candidates in accordance and in compliance with all prevailing laws, provided that such contributions are not made as an attempt to influence any decision or gain a business advantage. All political contributions require approval from the CEO & Managing Director.

The records of all political contributions shall be kept by the Compliance Officer.

7. Facilitation Payment and/or Extortion Payment

"**Facilitation payment**", often referred to as "*Duit Kopi*", is an illegal or unofficial payment or other gratifications given in return for services or benefits in which the payer is legally entitled to receive without making such payment. It is important to note that facilitation payments do not necessarily involve cash or other financial assets, it may be in the form of any advantage with the intention to influence the recipients in carrying out their duties.

Facilitation payment usually occurs as a payment to a Public Official or any person who has the authority to grant the following, which includes but not limited to certification, licenses, permissions or permits, in order to secure or expedite such process.

"**Extortion payment**" is the demanding of a gratification, whether or not coupled with a threat if the demand is refused.

The Company strictly prohibits accepting or giving, whether directly or indirectly, any facilitation payments or extortion payments.

However, there are certain situations or circumstance whereby a facilitation and/or extortion payment are forced to be made in order to protect one's life, limb or liberty. In such situations, any facilitation and/or extortion payment made must be immediately reported to the Head of Division/Department, the divisional Compliance Officer and Risk Management & Integrity Department.

8. Employees

The Company practices transparency and provides equal opportunity for any qualified and competent individual to be employed by the Company. As such, it is the Company's policy that appropriate and adequate due diligence is conducted on all prospective employees, taking into consideration the risk profile of the vacant position/role.

All Employees shall be provided with the Code of Conduct and Ethics for Employees and shall be required to comply with such code. In addition, all Employees shall undertake the Integrity Pledge, declare any actual or potential conflict of interest, and comply with the IJM-ABCS incorporated in their employment contracts. Appropriate training and communication in relation to anti-bribery and corruption shall also be provided to all Employees on a continuing basis.



9. Third Parties

The Company expects all Third Parties dealing with the Company to share its commitment to zero tolerance against all forms of bribery and corruption by complying with all applicable anti-bribery and corruption laws. It is the Company's policy to conduct appropriate and adequate due diligence on all Third Parties before entering into any formal arrangement.

All Third Parties will be provided with the Code of Business Conduct for Third Parties and shall be required to comply with such code and all other relevant policies at all times during the subsistence of their contractual relationship with the Company.

10. Whistleblowing

The Company encourages all its Employees, Third Parties, business partners, customers and members of the public to report any real and/or suspected bribery and corruption. All reports, complaints or disclosure made shall be kept strictly confidential. Anyone who makes a report, complaint or disclosure in good faith and without malicious intent shall be protected from any retaliation and discrimination, regardless of the investigation outcome.

The Company has established a whistleblowing channel, which is designed to facilitate and allow all Employees, Third Parties, business partners, customers and members of the public to report any real and/or suspected bribery or corruption. The details and procedures can be found in the Whistleblowing Policy at www.ijm.com.

11. Non-Compliance and Investigations

The Company treats all non-compliance and/or violations of this Policy and all applicable laws seriously. Any Employees found or reported to be non-compliant or in violation of this Policy or any applicable laws may be subject to disciplinary action, including termination of employment.

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

Title: Anti-Bribery & Corruption Policy		
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