

## **RUBBEREX CORPORATION (M) BERHAD (“RUBBEREX” or “GROUP”)**

(199601000297) (372642-U)

### **ANTI-CORRUPTION AND BRIBERY POLICY**

#### **INTRODUCTION**

This policy sets out the responsibilities and obligations of Rubberex’s employees and any other person or persons associated with the Group, with regards to observing and upholding the Group’s zero-tolerance stance on corruption and bribery. It also serves as a source of information and guidance for our employees in recognising or dealing with corruption and bribery in their workplace.

#### **1.0 POLICY STATEMENT**

- 1.1 Rubberex is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing guidelines that ensure bribery is prevented. Rubberex has zero tolerance for any form of corruption or bribery activities and is committed to acting professionally, fairly and with integrity in all business dealings and relationships, whether locally or overseas.
- 1.2 This policy covers employees at all levels of seniority, including and not limited to Board of Directors, Management, permanent staff, contractual workers, consultants, contractors, trainees or any third party associates such as actual and potential customers, suppliers, distributors, business contacts, agents, advisors, representatives of private or governmental bodies.
- 1.3 We are guided by the Guidelines on Adequate Procedures issued pursuant to section 17A(5) of the Malaysian Anti-Corruption Commission Act 2009 in the issuing of this Policy.

#### **2.0 ANTI-CORRUPTION AND ANTI-BRIBERY PRACTICES**

- 2.1 Rubberex does not accept or make any form of facilitation payments of any nature. We understand that such kickbacks are typically made in exchange for business favour(s) or advantage(s) and we do not accept such forms of bribery, whether directly or through any third parties;
- 2.2 Rubberex will not make any donations, whether in cash or kind, or by any other means, to support any political parties or candidates. We recognize that this may be perceived as an attempt to gain improper business advantage(s);
- 2.3 Rubberex will ensure that any charitable donations made are legal and ethical under local laws and practices, and that donations are not used to facilitate or conceal acts of bribery;
- 2.4 Rubberex accepts normal and appropriate gestures of hospitality and goodwill, whether given to or received directly from third parties, so long as the giving and/or receiving of gifts are not made with any explicit or implicit exchange of favours or benefits and is insignificant in monetary value; and

- 2.5 Rubberex will not participate in any illegal acts of money laundering, extortion, collusion, abuse of power and/or any form of bribery whether directly or passively or through any third party such as an agent, distributor or foreign public official anywhere in the world.

### **3.0 EMPLOYEE RESPONSIBILITIES**

- 3.1 Rubberex will ensure that all employees in the Group are equally responsible for the prevention, detection and reporting of any forms of corruption and bribery. They are also required to avoid any activities that could knowingly lead to, or imply, a breach of this Policy;
- 3.2 If there are any valid reason(s) to believe or suspect that corruption or bribery has occurred, the matter should be reported to the Human Resource Department; and
- 3.3 An employee, irrespective of seniority, who breaches this Policy could be subject to disciplinary action and could face dismissal for gross misconduct. Rubberex has the right to terminate a contractual relationship with an employee if he/she is found to have breached this Policy.

### **4.0 REVIEW AND MONITORING**

- 4.1 The Board of Directors is responsible for monitoring the effectiveness and adequacy of this Policy and will review the implementation at least once every three (3) years;
- 4.2 Rubberex will provide training on this Policy to relevant Heads of Departments as and when the need arises. This Policy shall also be communicated to suppliers, contractors, business partners or any other related persons at the outset of business relations, and as appropriate thereafter; and
- 4.3 This Policy does not form part of any employee's contract of employment and may be amended or revised at any time so as to improve the effectiveness at combating corruption and bribery.

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