

APM'S ANTI-BRIBERY & ANTI-CORRUPTION POLICY

(ABBREVIATED VERSION)

Effective Date:	21 February 2020	Document ID:	APM/APMCSS/GI/ABAC (ABBREV.)/1
Version:	2.0	Revision:	0
Document Owner:	Group Integrity	Approved by:	Board of Directors
Prepared by:	Group Legal	Endorsed by:	RMSC

FOR ALL PERSONNEL
& ASSOCIATED
PERSONS



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1. APM'S ANTI-BRIBERY AND ANTI-CORRUPTION STATEMENT

- 1.1 **APM AUTOMOTIVE HOLDINGS BERHAD** (Company No. 424838-D) and its group of companies ("APM") places the highest priority on transparency and integrity. We advocate good corporate governance, business ethics and social responsibility in our organization and its undertakings.
- 1.2 We do not tolerate any form of corruption (including the giving and receiving of bribes) and take the most serious view of any attempt to do so whether by members of our staff, contractors, agents or business partners. Alleged or suspected cases will be thoroughly investigated and appropriate action will be taken where necessary, including reporting such cases to the appropriate authorities, imposition of disciplinary action, termination, prosecution and recovery of losses.

2. ABOUT CORRUPTION & BRIBERY

- 2.1 We see corruption as the abuse of entrusted power for private gain whereas bribery on the other hand is perceived as the act of corruptly offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action, which is illegal, unethical, or a breach of trust. Facilitation payment is seen as unlawful gestures (including payment) made to secure or expedite the performance by a person performing a routine or administrative duty or function.

3. ABOUT APM'S ANTI-CORRUPTION & ANTI-BRIBERY POLICY

- 3.1 Our policy on anti-bribery and anti-corruption applies to all Personnel and Associated Persons no matter where they are located. It is aimed at addressing and managing the giving and acceptance of gifts, entertainment, hospitality and facilitation payments.
- 3.2 This policy is not a stand-alone document and forms part of our other codes, policies and regulations. It shall supersede all our prior policies, codes or regulation on bribery and corruption.
- 3.3 For the purposes hereof and in addition to the words already defined:
- 3.3.1 "Associate Companies" means companies or organizations in which no majority or controlling stake is held by APM and/or its nominee(s);

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- 3.3.2 “Associated Person” means Persons employed by or serving Associate Companies whose shareholders have unanimously or by majority agreed to exclusively adopt and comply with this Policy;
- 3.3.3 “Connected Person” means any person not being an Personnel that has dealings with APM such as its business partners, joint venture partners, agents, intermediaries, service providers, suppliers, contractors, sub-contractors, vendors, dealers and distributors;
- 3.3.4 “Gifts” means and includes tangible and non-tangible items such as money, sponsorship, contribution, physical gift, loan, fee or reward;
- 3.3.5 “Entertainment” means and includes any event, activity or performance designed to entertain, amuse or provide enjoyment including the giving or acceptance of food, drink or recreation of any kind; and
- 3.3.6 “Hospitality” means any form of accommodation or travel.
- 3.3.7 “Personnel” means all private individuals not being a Connected Person(s) who is employed by or serving APM at all levels and grades whether on permanent, contract secondment temporary or assignment basis including interns, trainees, workers, executives, supervisors, managers, officers, chairman and directors (executive and non-executive) wherever they are located;

4. APM’S POLICY ON THE GIVING AND ACCEPTANCE OF GIFT(S), ENTERTAINMENT, HOSPITALITY AND FACILITATION PAYMENT(S)

4.1 GIVING & ACCEPTANCE OF GIFT, ENTERTAINMENT AND/OR HOSPITALITY

- 4.1.1 No Gift, Entertainment and/or Hospitality are to be given or accepted unless the Gift, Entertainment and/or Hospitality itself and the giving or acceptance thereof:
 - 4.1.1.1 is approved in accordance with our Limits of Authority; AND
 - 4.1.1.2 meets the following underlying principles and purposes:
 - (i) ethical and lawful;
 - (ii) customary, infrequent and culturally appropriate;
 - (iii) modest, reasonable and not inappropriate or excessive;

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- (iv) will not place APM or its people in any position of conflict;
- (v) will not give rise to the expectation of any improper or unmerited favour or advantage from APM or its people;
- (vi) will not cause APM or its people to be in violation of any laws or regulations;
- (vii) will not unlawfully affect the judgement, decision or action of any relevant person including APM or its people;
- (viii) is not and will not be perceived as a bribe; and
- (ix) intended for the following purposes:
 - (a) promotion, management or sustaining of business;
 - (b) gesture of goodwill;
 - (c) token of appreciation;
 - (d) commemoration;
 - (e) customary practice; and/or
 - (f) such other lawful purposes as determined from time to time by our Risk Management and Sustainability Committee (RMSC).

4.1.2 Before approving the giving or acceptance of any Gift, Entertainment and/or Hospitality due consideration will be given to the following on a case to case basis:

- 4.1.2.1 the scale and value;
- 4.1.2.2 the actual recipient or provider; and
- 4.1.2.3 the timing;
- 4.1.2.4 the character of the Gift, Entertainment and/or Hospitality;
- 4.1.2.5 the business context; and
- 4.1.2.6 the element of reciprocity.

4.2 REJECTION

All Gifts, Entertainment and/or Hospitality that do not meet the provisions of this Policy will be rejected.

4.3 TREATMENT OF ACCEPTED GIFTS

Treatment for Gifts that have been accepted shall be in accordance with the following methods:

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- 4.3.1 Shared or consumed;
- 4.3.2 Donated;
- 4.3.3 Applied or used as prizes for any APM event or activity;
- 4.3.4 Retained by the beneficiary;
- 4.3.5 Retained for display purposes; or
- 4.3.6 Such other treatment as deemed fit the relevant Key Management Personnel.

Receipt of personal gifts via APM is not encouraged.

4.4 GIVING AND ACCEPTANCE OF FACILITATION PAYMENTS

No giving or accepting of offering, extortion, promising, paying, receiving or requesting for any Facilitation Payment(s) for direct or indirect benefit of APM or any of our people is permitted.

5. REPORTING CHANNELS

- 5.1 We believe it is essential to have an environment in which everyone connected with us feels that they can raise any matters of genuine concern in respect of corruption without fear of disciplinary action being taken against them or fear of reprisal.
- 5.2 We will ensure that all cases of corruption are managed in accordance with this policy. Rest assured, regardless whether the outcome of an investigation reveals any corruption or otherwise, there will be no retaliation against or adverse consequences at our end for the person reporting the incident in good faith. Further, no employee of ours will suffer any retaliation or adverse consequences for refusing to pay or accept a bribe.
- 5.3 All management and staff as well as those who have dealings with APM (including suppliers, service providers and business partners) are encouraged to report all cases of corruption involving APM (including suspected and attempted cases) to us in the following manner or to the relevant authorities:

By Mail:	APM AUTOMOTIVE HOLDINGS BERHAD (Company No. 424838-D) Lot 600, Jalan Raja Lumu, Locked Bag No. 218, 42009 Port Klang, Selangor Darul Ehsan, Malaysia Attn. The Group Integrity Officer
By Telephone:	+603-3161888 Ext. 8933 Group Integrity
By Email:	groupintegrity@apm.com.my

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6. ENQUIRIES

6.1 For any enquiries on APM's Policy on Anti-Bribery and Anti-Corruption, please contact:

APM AUTOMOTIVE HOLDINGS BERHAD
(Company No. 424838-D)
Lot 600, Jalan Raja Lumu, Locked Bag No. 218, 42009 Port Klang, Selangor Darul Ehsan,
Malaysia
Attn. The Group Integrity Officer
Tel. +603-3161888 Ext. 8933 Group Integrity
Email. groupintegrity@apm.com.my

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