

## **RGT BERHAD**

Registration No. 198101004909 (71024-T)  
(Incorporated in Malaysia)

### **ANTI-BRIBERY & CORRUPTION POLICY**

#### **1. POLICY STATEMENT**

RGT Berhad Group of Companies (“RGTBHD Group” or “the Group”) is committed to conduct its business ethically by having procedures for the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices by adopting this Anti-Bribery and Corruption Policy (“Policy”). The Group are legally obliged to have a zero-tolerance policy and will comply with the Malaysian Anti-Corruption Commission Act 2009 and the new provision of Malaysian Anti-Corruption Commission Act 2018 (“MACC ACT”) and any of its amendments from time to time.

#### **2. SCOPE AND PURPOSE**

Our policy is applicable to the Board of Directors of the Company (“Board”), management, and all employees of the Group including the company’s suppliers, contractors, subcontractors, agents or intermediary, and any other person associated with or acting on behalf of the Group.

The purpose of this policy is to remind all the stakeholders that the Group takes this Anti-Bribery and Anti-Corruption seriously by complying to the MACC Act and we have put in adequate procedures in place to address those non-compliance as bribery/corruption can lead to serious reputational damage to the Group.

#### **3. DEFINITION OF BRIBERY/CORRUPTION**

Bribery refers to any offering, giving, promising, receiving, accepting or soliciting to have an added advantage to induce a decision to be made through illegitimate means.

Bribery, abuse of power, fraud, deception, embezzlement, money laundering are all forms of corruption.

Some of the forms of Bribery includes the followings:

i) **Gift & Corporate Hospitality Policy**

Employees or their family members or persons connected to them should not receive any form of monetary or non-monetary items from suppliers and customers with exception of gifts received without any intention to influence a business advantage or against the MACC Act.

Corporate gifts, festive or ceremonial gifts may be given or receive to/from business partners if there are no expectations or obligations to any favourable or advantages to the giver/receiver. The gift must be of reasonable value and made openly by recording it in the log book.

ii) **Facilitation Payments and Kickbacks**

This is a form of free reward which can alter someone’s behaviour and gain a favourable reward.

iii) **Charitable Donations**

We will only provide charitable donations which are legal and ethical under applicable laws. All donations made must be approved by the Chief Executive Officer (“CEO”).

iv) Political Contributions

A political contribution is a contribution, financial or in-kind, to support political activities. Financial contributions include loans. In-kind contributions include gifts of property or services, advertising or promotional activities endorsing a political party, the purchase of tickets to fundraising events and contributions to research organizations with close associations with a political party including the release of employees without pay from the employer to undertake political campaigning or to stand for office. The Group does not make any political contributions.

RGTBHD maintains the principle of political impartiality and compliance with laws and democracy in all the countries where we operate. Employees have the right to engage in political activities but shall not act related to political activities in the Group and not use the Group's resources to take such actions in support of or opposition to a political party.

v) Conflict of Interest

All employees must avoid conflict of interest and are expected to perform their duties honestly, in good faith and in accordance with the best interests of the company. Employees must disclose any relationships or situations that can be construed as a conflict of interest against the company as soon as the potential situation arises.

vi) Use of company assets

All employees have the responsibility to protect the company's assets from theft, loss, abuse, unauthorized use or disposal. They must use company assets only for the purpose related to conducting the company's business and may use the company assets for other uses only when properly authorized

#### **4. ROLES AND RESPONSIBILITIES**

- a) The Board approves the Policy and its programme and delegates responsibility to the Risk Management Committee for overseeing this Policy and its programme to ensure compliance.
- b) The Audit Committee reviews and oversees the internal control system and financial reporting processes and related functions including countering bribery and corruption. The Audit Committee shall report to the Board of Directors periodically and recommend actions to the Board and senior management.
- c) Senior management, led by CEO, is responsible for demonstrating commitment throughout the Group including setting up the system to support the policy for employees and associated parties to adopt for operation. The senior management shall report to the Risk Management Committee periodically for the result of programme review.
- d) All Head of business unit including all levels of managers and supervisors are responsible for ensuring that employees who report to them are made aware of and understand this policy. Prompt reporting of any issues or concerns to senior management shall be made.
- e) All employees must uphold this policy when performing their duties. Anyone who discovers or suspects violation of this Policy must report them to a supervisor or through channels established by this Policy.

#### **5. RISK ASSESSMENT**

Risk assessment is to be incorporated into the organisational general risk management ("ERM") and shall be carried out on a periodically basis with at least once in a financial year, to assess and prevent the risks of corruption that the Group is facing when doing business.

Findings of the assessments should be used to establish appropriate processes, systems and controls to mitigate corruption risks.

## **6. INVESTIGATION PROCEDURES**

If a report is made relating to the potential act of bribery or corruption, the person designated to investigate the complaint will write to the reporting individual wherever reasonably practicable of the concern being received, for the purposes of acknowledging that concern has been received.

If the conduct complained constitutes an improper conduct, the Investigative Committee shall initiate disciplinary proceedings and/or or take such steps as it deems appropriate (including but not limited to making a police report) against the person who had committed the improper conduct.

The committee will ensure investigations are carried out using appropriate channels, resources and expertise. The Investigative Committee will report to the Risk Management Committee accordingly.

## **7. PROCEDURES FOR WHISTLEBLOWING CHANNEL**

Disclosures can be made to your respective Division Directors or you may report such concerns using the reporting channels under our Whistleblowing Policy available at <https://rgtberhad.com/corporate-governance/>.

Whistleblower is required to identify and provide details pertaining to the issue/allegation.

All concerns reported will be taken seriously, treated in confidential manner and investigated immediately.

It Is the Group's policy to provide the whistleblower protection in term of confidentiality of information and safeguard the whistleblower from any act of interference that may be detrimental to the whistleblower. The Group assures that all reports will be treated with strict confidentiality and upon verification of genuine cases, prompt investigation will be carried out.

If you believe you have been subjected to any unjust treatment as a result of a concern or refusal to accept a bribe, you should inform our Risk Management Committee.

## **8. TRAINING AND COMMUNICATIONS**

Regular training on the Anti-Bribery and Anti-Corruption approach shall be provided to all our existing employees. New employees are also provided with this training during orientation. We have stressed to the employees that if there is any doubt, they should contact their Head of Department or Divisional Director for further clarifications before accepting the gift.

Our Business Partner and stakeholders will be informed of our Policy and we will remind them that we do not tolerate to any form of bribery and corruption practices in our Group. We will send a copy of this Policy at the onset of the business relationship or they can always refer to this Policy published on our Company website at [www.rgt.com.my](http://www.rgt.com.my).

All employees and suppliers is required to sign off the Anti-Bribery and Anti-Corruption form.

## **9. REVIEW OF THE POLICY**

The Board will review this Policy, as appropriate, to ensure the effectiveness of this Policy. The Risk Management Committee will discuss any revisions that may be required and recommend any such revisions to the Board of consideration and approval.

## **10. MONITORING OF THE POLICY**

The Board is committed in making this anti-bribery and anti-corruption effort as a continuous effort to maintain our reputation.

The Risk Management Committee will assist the Board by having a sub-committee to:

- i) Provide guidance to employees in regards to possible conflict of interest
- ii) Invitations to accept/offer bribes
- iii) Request for facilitation payments, particularly when payments are made under any form of corruption/bribery.
- iv) Maintaining a log book of reported cases

Internal control systems and procedures will be reviewed regularly for improvements and to provide assurance that it is effective in countering bribery and corruption.

Our employees are encouraged to raise any concerns in this anti-bribery and anti-corruption practices to the Board.

## **11. ENFORCEMENT**

The Board regards the acts of anti-bribery and anti-corruption very seriously.

For our employees, any non-compliance will lead to immediate disciplinary action and termination of employment.

For our Business Associates, any non-compliance will lead to termination of contract and claim for damages, if any.

## **12. ENQUIRIES**

In the event of any enquiries, you may contact us at [antibribery@rgt.com.my](mailto:antibribery@rgt.com.my).

This Policy is approved by the Board of Directors on 19 May, 2020.