



# ISKANDAR INVESTMENT BERHAD

## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

### 1.0 Introduction

Iskandar Investment Berhad ("IIB" or "the Company") and its subsidiaries ("IIB Group" or "the Group") are committed to conducting its business with integrity. The Group takes a strong stance against all acts of bribery and corruption.

This Anti-Bribery & Anti-Corruption ("ABAC") Policy is to enforce IIB's Code of Conduct or other relevant policies and procedures, to ensure its employees and business associates (e.g. suppliers, partners and consultants, contractors, etc.), understand their responsibilities in compliance with the Group's zero tolerance for bribery and corruption.

The Governance, Risk and Compliance Department ("GRC") is the ABAC compliance function that is responsible to drive, oversee and facilitate all ABAC and integrity matters within IIB Group.

### 2.0 Purpose / Objective

The ABAC Policy describes IIB's stance on prohibiting bribery and other corrupt practices in the conduct of IIB business operations. In addition, the ABAC Policy sets out the key principles and guidelines in relation to ABAC and integrity issues that may arise in the conduct of business dealings of IIB Group.

The ABAC Policy is in line with the requirements pursuant to the Malaysian Anti-Corruption Commission ("MACC") Act 2009 and any other relevant anti-corruption laws and regulations.

### 3.0 Policy/ Commitment

The following outlines IIB's policy/ stance on bribery, corruption and integrity matters:

- i. **Solicitation or receiving of bribe** – IIB prohibits its employees and business associates from soliciting or receiving bribes in its business dealings. Employees of IIB will not be punished for refusing to receive a bribe, even if the refusal results in a loss of business to IIB;
- ii. **Offering or giving of bribe** – IIB prohibits its employees and business associates from offering or giving bribes to any person, including government/ public officials or business associates in its business dealings. Employees of IIB will not be punished for refusing to offer or give a bribe, even if the refusal results in a loss of business to IIB;
- iii. **False claims** – IIB prohibits its employees and business associates from making false claims, whether related to expenses, contracts, or any other business dealings;
- iv. **Abuse of positions for gratification** – IIB prohibits its employees from abuse of positions in its business dealings;
- v. **Corporate liability** – IIB recognizes its corporate liability as per Section 17A of the MACC Act 2009 and will ensure compliance with this provision. Robust anti-corruption measures shall be in place to prevent corrupt practices within the organization, and the Company will cooperate with any investigations related to corporate liability;

- vi. **Obligation to report to authorities on any attempt to solicit or offer a Bribe** – All employees and its business associates have an obligation to report any bribery and corrupt practices to the relevant authorities. IIB will support and protect employees and its business who report such attempts and ensure confidentiality and non-retaliation. Any employee(s) or IIB's business associates in violation of the ABAC Policy shall face disciplinary action and/ or legal consequences. Non-compliance shall be dealt in line with laws and regulations and include reporting to MACC and/ or other enforcement agencies, where appropriate;
- vii. **Conflict of interests** – All IIB employees should avoid situations in which personal interest could conflict with their professional obligations or duties. Conflicts of interest arise in situations where there is personal interest that could be considered to have potential interference with objectivity in performing duties or exercising judgment on behalf of the Company;
- viii. **Record keeping** – IIB shall maintain accurate records as per any applicable laws and have appropriate internal controls in place to substantiate internal decisions (e.g. approvals and records of gifts, hospitality, donations and similar benefits given and received, etc.); and
- ix. **Raising/ reporting integrity concerns** – Employees, business associates or any other member of the public that encounter an actual or suspected violation of this ABAC Policy are required to report their concerns using IIB's official whistle blowing/ reporting channels (available on IIB's Corporate website). Report made shall be in good faith, either anonymously or otherwise, shall be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation.

#### **4.0 Reporting Structure**

The reporting structure of ABAC and integrity matters shall be in accordance with IIB's approved organisation structure.

#### **5.0 Guidelines / Procedure**

Guidelines/ procedures shall be established to enable effective and efficient management of ABAC and integrity related activities throughout IIB. The ABAC Policy shall be read in conjunction with any supplementary guidelines/ procedures developed by GRC.