

CAB CAKARAN CORPORATION BERHAD

(200201015998) (583661-W)

反贿赂和反腐败政策

ANTI-BRIBERY AND CORRUPTION POLICY

1. 简介

INTRODUCTION

CAB Cakaran Corporation Berhad (“ CAB Corp”) 及其子公司（统称为“集团”）本着以法律依据及道德的方式开展业务。本集团要求所有雇员（包括全职，试用，合同和临时员工）（统称为“雇员”）和董事都以专业和正直的态度进行商业交易。

CAB Cakaran Corporation Berhad (“CAB Corp”) and its subsidiaries (collectively referred to as the “Group”) conduct its business in a legal and ethical manner. The Group requires all employees (including full time, probationary, contract and temporary staff) (“Employees”) and Directors of the Group to be committed to acting professionally and with integrity in their business dealings.

本集团将采取合理及适当的措施，以确保其业务往来中不会为了自己的优势或利益而涉及贪污活动。本《反贿赂和反腐败政策》（“政策”）列出了防止与本集团业务往来中发生贿赂和贪污行为的限制。本政策补充于本集团的《道德与行为准则》，应与之一并阅读。

The Group will take reasonable and appropriate measures to ensure that its businesses do not participate in corrupt activities for its advantage or benefit. This Anti-Bribery and Corruption Policy (“Policy”) sets out the parameters to prevent the occurrence of bribery and corrupt practices in relation to the businesses of the Group. This Policy is supplemental to, and shall be read in conjunction with the Code of Ethics and Conduct of the Group.

2. 贿赂和腐败的定义

DEFINITION OF BRIBERY AND CORRUPTION



贿赂是一种提供，承诺，给予，接受或索取利益的手段，以诱使人们采取非法，不道德或违反信任的行为。贿赂是一个诱因或奖励，承诺或赠予以期获得任何商业，合同，监管或个人优势，它可以是礼物，贷款，费用，奖励或其他好处的形式。

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage and can take the form of gifts, loans, fees, rewards or other advantages.

腐败是滥用委托权力谋取私利。

Corruption is the abuse of entrusted power for private gain.

3. 目的

OBJECTIVE

本政策的目的是为董事和员工在行为标准上提供明确指导，以及如何识别和处理贿赂和贪污。

The objective of the Policy is to provide clarity and guidance to the Directors and Employees on standards of behaviour to which they must adhere and how to recognise as well as deal with bribery and corruption.

本政策并非详尽无遗，董事和员工在履行职责时可能还会承担其他义务。实际上，董事和员工在执行职务时应确保遵守所有适用的法律，法规和规章。

The Policy is not intended to be exhaustive, and there may be additional obligations that the Directors and Employees are expected to adhere to or comply with when performing their duties. For all intents and purposes, the Directors and Employees shall always observe and ensure compliance with all applicable laws, rules and regulations to which they are bound to observe in the performance of their duties.

4. 应用范围

APPLICABILITY



本政策适用于集团的所有董事和员工。每个员工都有责任详读和理解本政策。任何违反本政策的条规可能会导致纪律处分，包括解雇。董事或雇员如需进一步澄清，他/她可以联系集团人力资源部 (*Group Human Resource Department*)。董事可以向董事局反映任何问题，而员工则可向部门主管/子公司或集团人力资源部报告。

The Policy is applicable to all Directors and Employees of the Group. Each Employee has a duty to read and understand the Policy. Violation of any of the Policy's provisions may result in disciplinary action, including termination of employment. If a Director or an Employee requires further clarification on the Policy, he/she may liaise with the Group Human Resource Department. A Director may highlight any concerns to the Board whereas an Employee may highlight to the Head of Department/Subsidiary or the Group Human Resource Department.

5. 常见的贿赂和腐败形式

GUIDANCE ON COMMON FORMS OF BRIBERY AND CORRUPTION

5.1 礼物和款待

Gifts and Hospitality

只要属于合理，适当，适度和善意的，本政策不会禁止正常的公司招待。

This Policy does not prohibit normal business hospitality, so long as it is reasonable, appropriate, modest and bona fide corporate hospitality.

可接受的礼物和/或利益的例子如下：

Some examples of acceptable gifts and/or benefits are as follows:

- (a) 在商业场合中向所有参与者提供的象征性礼品，例如与工作有关的研讨会，会议，贸易和商业活动；

token gifts offered in business situations or to all participants and attendees, for examples, work related seminars, conferences, trade and business events;

(b) 在与工作有关的会议，研讨会和/或商业活动中赠送的礼物；

gifts presented at work-related conferences, seminars and/or business events;

(c) 为承办商务活动，会议和/或研讨会而给予谢意礼物；

gifts given in gratitude for hosting business events, conferences and/or seminars;

(d) 会议期间或作为与工作相关的会议和/或研讨会提供参加者的茶点或餐点；和

refreshments or meals during meetings or as participants of work-related conferences and/or seminars; and

(e) 商业用膳。

meals for business purposes.

一般原则上，董事和雇员不得接受或馈赠礼物给第三方，以致影响第三方获取或保留业务，或以交换利益为目的。此外，董事和雇员不应接受豪华或不合理的礼物或款待，因为这些礼物或款待可能被视为试图获得或接受个人利益的商业待遇。

As a general principle, the Directors and Employees should not accept or give a gift to a third party if it is made with the intention of influencing the third party to obtain or retain business, or in exchange for favours or benefits. In addition, lavish or unreasonable gifts or hospitality should not be accepted as such gifts or hospitality may be perceived or interpreted as attempts by the Directors or Employees to obtain or receive favourable business treatment for personal benefits.

董事和员工在赠送或接受礼物或款待时应谨记，因为这可能被视为影响接收者决策的一种方式。因此，董事和员工应考虑礼物或款待背后的意图。

The Directors and Employees should be mindful in giving or receiving gifts or hospitality as it could be perceived as a way of improperly influencing the decision

making of the recipient. Hence, the intention behind the gifts or hospitality should always be considered.

5.2 给公共机构官员的疏通费

Facilitation Payments To Officer of Public Body

疏通费是为确保或加快公共机构官员的例行行动而采取的非官方付款或其他优惠。董事或雇员不得向任何公共机构的官员承诺或提供或同意提供疏通费。

Facilitation payments are unofficial payments or other advantages made to secure or expedite the performance of a routine action by an officer of public body. Directors or Employees shall not promise or offer, or agree to give or offer, facilitation payments to an officer of any public body.

但是，在某些情况下，董事或雇员别无选择，只能支付疏通费，以保护自己免受到伤害或生命危险。在这种情况下，任何疏通费的要求都应立即报告给上级或部门/部门主管。

However, there could arise circumstances in which the Directors or Employees have no alternative but to make a facilitation payment in order to protect themselves from injury, loss of life or liberty. Any request for facilitation payment under such circumstances should be reported immediately to the superior or Head of Division/Department.

5.3 第三方和代理商

Third Parties and Agencies

与本集团进行业务往来的所有第三方，包括代理商，供应商和其他的合作伙伴，应了解本政策，并须遵守本政策里的条款，包括规定与本集团进行业务往来的所有第三方遵守关于贿赂和腐败有关的最低标准和程序。

All third parties, including agents, suppliers and external stakeholders in business dealings with the Group should be made aware of this Policy and the arrangements with them shall be subject to clear contractual terms, including specific provisions

requiring them to comply with minimum standards and procedures relating to bribery and corruption.

5.4 政治捐款

Political Contribution

在遵守有关政治捐款的现行法律制度下，本集团可以向政党或政治人物捐款。所有政治捐款需获得执行主席/集团董事总经理的批准。所有政治捐款的记录应由集团人力资源部 (*Group Human Resource Department*) 保存。

Subject to any prevailing law that governs political contribution, the Group may make contribution to political parties or candidates. All political contributions require approval from the Executive Chairman/Group Managing Director. The records of all political contributions shall be kept by the Group Human Resource Department.

5.5 慈善捐款

Charitable Contribution

慈善援助和捐赠，无论是实物，服务性质，知识，时间或是直接的财务捐助，都是可以接受的（本集团鼓励慈善捐款）。但是，董事和员工必须小心确保慈善捐款不会被用作为隐瞒贿赂的计划。未经执行主席/集团董事总经理的事先批准，不得提供或进行任何慈善捐赠。所有慈善捐款的记录应由集团人力资源部 (*Group Human Resource Department*) 保存。

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, Directors and Employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. No donation can be offered or made without the prior approval of the Executive Chairman/Group Managing Director. The records of all charitable contributions shall be kept by the Group Human Resource Department.

6. 记录保存

RECORD-KEEPING

在正常业务经营过程中，有关部门必须记录与保存向第三方支付的所有款项，因为这将证明这些款项是善意的，并且与腐败和/或不道德行为无关。所有与第三方（例如客户，供应商和业务联系人）交易的有关帐目，发票和文件，都应准确，完整地记录和保存。

It is important that proper and complete records be maintained of all payments made to third parties in the usual course of business as these will serve as evidence that such payments were bona fide, and not linked to corrupt and/or unethical conduct. All accounts, invoices, documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with accuracy and completeness.

员工必须呈报接受或提供的所有款待或礼物，并将详细信息提交给集团人力资源部（*Group Human Resource Department*）指派的负责人，以便记录到登记册中，如有必要，该记录应由管理层进行审查。

Employees must declare all hospitality or gifts accepted or offered, and submit details to the person in-charge who is assigned by the Group Human Resource Department for recording into a register which will be subject to the Management's review, if needed.

7. 遵守法律

COMPLIANCE TO THE LAW

本集团将遵守集团经营辖范围内政府、委员会和交易所的所有法律、法规和规章。董事和员工应了解并遵守《2009年马来西亚反腐败委员会法》（包括其任何修正案）。本集团保留向警方或其他有关当局举报任何怀疑为犯罪性质的行为或活动的权利。

The Group will comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions within which the Group operates. Directors and Employees are expected to understand and comply with the Malaysian Anti-Corruption Commission Act 2009 (including any amendment thereof). The Group reserves the right to report any actions or activities suspected of being criminal in nature to the police or other relevant authorities.

8. 举报违反政策的程序

REPORTING OF VIOLATIONS OF THE POLICY

本集团鼓励任何知道或怀疑违反本政策的员工，通过集团规定的程序举报相关问题。有关举报违反政策的程序，请浏览 CAB Corp 的网站，网址为 www.cab.com.my。任何举报者都不会受到歧视或遭受任何形式的报复。本集团将会保密处理所有举报的案子。

Any Employee who knows of, or suspects, a violation of the Policy, is encouraged to whistle-blow or report the concerns through the mechanism set out under the Group's Whistle-blowing Policy. The provision, protection and procedure of the Whistle-blowing Policy for reporting of the violations of the Policy are available on the CAB Corp's website at www.cab.com.my. No individual will be discriminated against or suffer any sort or manner of retaliation for raising genuine concerns or reporting in good faith on violations or suspected violations of the Policy. All reports will be treated confidentially.

9. 审查政策

REVIEW OF THE POLICY

董事会将观察该政策的遵守情况，并定期审查该政策，以确保该政策仍然具有相关性和有效性。

The Board will monitor compliance with the Policy and review the Policy regularly to ensure that it continues to remain relevant and appropriate.

本政策已于 2019 年 12 月 20 日由董事会审核通过。

This Policy was reviewed and approved by Board on 20 December 2019.