

# **FEDERAL INTERNATIONAL HOLDINGS BERHAD**

## **ANTI-BRIBERY AND CORRUPTION (“ABC”) POLICY**

### **INTRODUCTION**

Federal International Holdings Berhad (“FIHB”) Group is committed to conducting its businesses and operations with the highest standards of ethics and integrity. This Anti- Bribery and Corruption Policy (“This Policy”) covers FIHB Group’s principles and standards in relation to ABC, in order to ensure that all employees, directors and associated external parties understand their responsibilities to comply with FIHB Group’s zero tolerance policy towards bribery and corruption.

#### **1. SCOPE**

- 1.1 This Policy applies to all employees, directors, and associated external parties acting on behalf of or for FIHB Group , including but not limited to, agents, contractors, consultants, suppliers, service providers, associate companies, business partners and joint venture partners or entities. (hereinafter referred to as “Affected Parties”)

#### **2. ANTI-BRIBERY AND CORRUPTION STANCE**

- 2.1 All Affected Parties of FIHB Group must refrain from any acts of bribery and corruption, whether it is for their own personal benefit or for the benefit of FIHB Group.
- 2.2 “Bribery” includes offering, promising, giving, authorising, demanding or receiving anything of value to anyone in the form of bribes and/or any other improper **gratification** (see definition in clause 3 below), in order to improperly influence the outcome of any transaction.
- 2.3 “Corruption” is defined by Transparency International as the abuse of entrusted power for private gain.
- 2.4 FIHB Group strictly does not tolerate any bribes given or accepted for personal gain, or for the purposes of obtaining or retaining business for or providing a business advantage to FIHB Group.
- 2.5 Any director or employee who breaches this Policy will be subjected to disciplinary actions, including dismissal.
- 2.6 Any associated external party who breaches this Policy will face severe consequences, including termination of the business relationship by FIHB.

#### **3. DEFINITION**

“**FIHB Group**” refers to Federal International Holdings Berhad and its subsidiaries.

“**Gratification**” shall have the meaning defined in the Malaysian Anti Corruption Commission Act 2009 to include:

- (a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;



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### **ANTI-BRIBERY AND CORRUPTION POLICY (CONT'D)**

- 5.3 Travel-related expenditure (eg travel fares, meals, or accommodation) incurred for legitimate business activities (eg audit or factory visit) shall abide by the following principles:

**Relevance** Travel-related expenditure should only be to the extent necessary to perform a legitimate business-related activity. Travelling expenses for personal purposes (eg entertainment after working hours or extended travel for leisure) shall be borne by the respective individual.

**Appropriate** The type of travel and class of accommodation must be appropriate and reasonable in relation to the circumstances, such as length of trip and seniority of the traveller.

#### **6. DONATIONS AND SPONSORSHIPS**

- 6.1 All Affected Parties may donate or sponsor political parties in their personal capacity, however, it shall never be in exchange for any business implications to FIHB Group.
- 6.2 Any donations and sponsorship made for or on behalf of FIHB Group must be done with the approval of the Executive Directors and the Anti-Bribery and Corruption Officer.
- 6.3 The Executive Directors and Anti-Bribery and Corruption Officer shall conduct due diligence and conflict of interest checks prior to the donation and sponsorship, to avoid corruption or perceived corruption.
- 6.4 To avoid perceived or actual conflict of interest, donations or sponsorship shall not be made to or received from a regulator, customer, or entities related to them, if the Group is in the midst of negotiations or applying for or renewing licenses.

#### **7. BUSINESS REWARDS, REBATES, COMMISSIONS, DISCOUNTS OR OTHER INCENTIVES**

- 7.1 Business rewards, rebates, discounts, or other incentives that are offered or received should not be contradictory with anti-corruption laws and regulations or formulated to obtain or retain an undue business advantage.
- 7.2 Business-related incentives offered or provided must fulfil the following conditions:
- formally documented (eg rewards program or credit policy); and
  - applicable to all or based on standardised parameters (e.g. applicable to all customers or applicable to customers exceeding certain order amounts).

#### **8. BUSINESS DEALINGS WITH INTEGRITY**

- 8.1 FIHB Group has and will continue implementing due diligence checks on all Affected Parties before appointment or engagement.

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### **ANTI-BRIBERY AND CORRUPTION POLICY (CONT'D)**

- 8.2 For business arrangements or activities which bear a higher corruption risk, as determined by FIHB Group from time-to-time, FIHB Group may mandate the associated external parties to put in place policies and procedures to prevent the conduct of corruption activities.

#### **9. RECORD KEEPING**

- 9.1 Proper, accurate and complete records of all transactions made by FIHB Group must be maintained, including corporate records, timesheets, work records, supply records, bank statements, accounts, receipts, invoices and other supporting documentation.

- 9.2 These records shall be retained for at least seven years from the period to which they relate.

#### **10. TRAINING, REVIEW AND COMMUNICATION**

- 10.1 All directors and employees of FIHB Group are responsible to complete all training modules relating to this Policy and to keep themselves up to date with this Policy.

- 10.2 This Policy will be reviewed from time-to-time, and at least once every three years to ensure it remain relevant and in compliance with the current law.

- 10.3 This Policy must be communicated to all FIHB Group's associated external parties at the outset of the business relationship and as appropriate thereafter.

#### **11. REPORTING CHANNELS**

FIHB Group has put in place Whistleblowing Policies and Procedures to provide a confidential and safe avenue for all Affected Parties and members of the public to disclose any suspected, attempted or actual acts of bribery or corruption. Click on <https://www.fihb.my/> for more details.

#### **12. AUDIT AND INVESTIGATION**

- 12.1 In the event of suspected, attempted or actual bribery or corruption committed by our Affected Parties, FIHB Group reserves the right to institute an investigation, either conducted internally or by an external party.

#### **13. SUPPORT**

- 13.1 Where an Affected Person is unsure on any practices which relate to this Policy, s/he must always consult the head of department (for employees), contact person from FIHB Group (for associated external parties) or the Anti-Bribery and Corruption Officer, details of which are as follows:

Name	: Albert Fua
Contact no	: 03 7955 9937
Email address	: albertfua@masteron.com.my