



AVILLION
BERHAD

(Registration No. 199201013018)

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

Revisions

First Issuance	29 May 2020 (Board approved on 29 May 2020)
First Revision	27 May 2024 (Board approved on 27 May 2024)

1.0 INTRODUCTION

- 1.1** Pursuant to sub section (5) of Section 17A under the Malaysian Anti-Corruption Commission Act, 2009 and the Malaysian Anti-Corruption Commission (Amendment) Act 2018, the Anti-Bribery and Corruption Policy ('Policy') of **Avillion Group ('AVI Group')** is prepared based on the Guidelines on Adequate Procedures issued by the National Centre For Governance, Integrity and Anti-Corruption (GIACC).
- 1.2** The Policy sets out the ethical framework to guide actions and behaviours of all Directors and Employees of **AVI Group** in the conduct of their business activities. It reflects the increasing need for effective corporate governance compliance measures in the conduct of **AVI Group's** businesses locally and overseas. They include discipline, good conduct, professionalism, loyalty and integrity and cohesiveness which are critical success factors for **AVI Group**.
- 1.3** This Policy is supplemental to, and shall be read together with **AVI Group's** internal policies and procedures, Whistleblowing Policy and Employee Handbook.

2.0 OBJECTIVES

- 2.1** The objective of the Policy is to provide guidance to all Directors and Employees of **AVI Group** on standards of behaviour to comply with and ensure compliance of all applicable laws, rules and regulations in the discharge of their duties. It is not intended to be exhaustive and there may be additional obligations that the Directors and Employees are expected to adhere to in the performance of their duties.

3.0 SCOPE

- 3.1** The Policy is applicable to all Directors (Executive and Non-Executive) and Employees (including full-time, probationary, contract and temporary staff) including third parties and agencies of **AVI Group**. Third parties and agencies include but are not limited to current or prospective customers, business partners, contractors, suppliers, consultants, agents, associates or any other business partners.

4.0 DEFINITION OF BRIBERY AND CORRUPTION

- 4.1** Bribery is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. They include gifts, entertainment, hospitality, rewards and other forms of advantages. Once bribery has occurred, it can lead to other forms of corruption.
- 4.2** Corruption is the abuse of entrusted power for personal gain. Conflict of interest may arise in situations where personal interest has potential interference with :-
- objectivity in performing professional obligations and duties.
 - exercising of judgement in the discharge of duties and responsibilities.

The individual's official position, company's working hours, resources and assets or information accessible to him or her may be misused for personal interest or to the company's disadvantage.

5.0 COMMON FORMS OF BRIBERY & CORRUPTION

5.1 Gifts & Hospitality

- 5.1.1 The Policy strictly prohibits all Directors and Employees from accepting gifts and/or hospitality in no matter the value of gift and/or hospitality. This is to avoid situations that may influence the employee's judgement in decision-making process or put the Employees in a position of conflict or obligation.
- 5.1.2 Any giving of gifts and/or hospitality to a Third Party will requires prior approval from Management of **AVI Group**.

Refer to **Appendix 1** on Gifts & Hospitality Guidelines.

5.2 Third Parties & Agencies

- 5.2.1 All arrangements with third parties and agencies including agents, suppliers, contractors and business partners shall be subject to transparent contractual terms including special provisions requiring them to comply with minimum standards and procedures relating to bribery and corruption. They are required to acknowledge / confirm in writing that they :-
- understand and will comply with all laws relating to anti-bribery and anti-corruption.
 - have not been convicted or subject to any investigations by the relevant authorities for actual or suspected breach of law.
 - undertake to inform **AVI Group** of any breach or infringement of the Policy.
 - acknowledge that **AVI Group** has the right to terminate or suspend their contract and disqualify them from tendering for future contracts if they are found in breach of the Policy.
- 5.2.2 The above acknowledgement / confirmation shall form part of the terms and conditions of their appointment and / or contract of service.

5.3 Facilitation Payments

- 5.3.1 Facilitation payments refer to unofficial payments or other advantages made to secure or expedite performance of a routine action by an officer of a public body. Directors or Employees shall not promise or offer facilitation payments to an officer of any public body. Any request for facilitation payment must be reported immediately to the superior or Head of Division or Management for further advice.

5.4 Donations & Sponsorships

- 5.4.1 Donations and sponsorships (gifts or hospitality) may be given to Suppliers or any other Third Party for legitimate or valid causes to support local community or welfare development and reciprocal business arrangements. However, it must be ensured that donations and sponsorships are not used as a scheme to conceal bribery or corruption practices.
- 5.4.2 The Head of Department / Company must perform and / or ensure the following :-
- Request for donation and sponsorship is to be supported by an official request in writing by theintended recipient.
 - Background and reputation of the intended recipient is to be reviewed in writing before approvalby immediate superior or Management.

Upon receipt of donation / sponsorship by the recipient, receipt of acknowledgement is to beobtained from the recipient.

5.5 Political Contributions

5.5.1 No contribution should be made by **AVI Group** to any political parties or candidates.

6.0 RECORD MANAGEMENT & CONTROL

6.1 Appropriate and complete invoices, documents and records on all transactions with third parties including customers, suppliers, contractors and business contacts are to be maintained to ensure they are bona fide and conform to generally accepted and applicable laws and regulations.

7.0 AWARENESS & COMPLIANCE WITH LAWS & REGULATIONS

7.1 Human Resource Department shall coordinate and disseminate relevant communications, internal and external training to refresh staff awareness on anti-bribery and anti-corruption system.

7.2 **AVI Group** shall comply with applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions and countries where it operates. Appropriate and reasonable measures shall be taken to ensure **AVI Group** complies with the Anti-Bribery and Anti-Corruption Policy (including any amendment thereof).

8.0 ADMINISTRATION

8.1 Reporting of Violation of Policy

8.1.1 Any Employee who encounters actual or suspected violation of the Policy is encouraged to :-

- a) obtain independent advice, if he or she is not certain of an appropriate legal or ethical course of action.
- b) whistle blow or report any concerns through appropriate channels under **AVI Group**'s Whistle Blowing Policy and Procedures.

8.1.2 No individual shall be discriminated against or subject to any form of reprisal for :-

- a) refusing to pay or receive bribes or participate in any unethical activities.
- b) raising or reporting any genuine suspicions, concerns or queries in good faith on actual or suspected violation of the Policy.

8.1.3 If an investigation concludes that an improper conduct had been committed, the matter shall be handled in accordance with **AVI Group**'s disciplinary procedures and applicable laws and regulations of the domicile company or subsidiary. Improper conduct includes illegal act, malpractice, unethical conduct and other forms of wrongful conduct, which if proven, constitutes a disciplinary or criminal offence.

8.2 Staff Declarations

8.2.1 All Employees are required to sign a Declaration Form on Anti-Bribery and Anti-Corruption Policy that they have read, understood and will abide by the Policy before returning the Form to Human Resource Department for safekeeping.

9.0 MONITORING & REVIEW OF POLICY

- 9.1 All employees are responsible for the successful implementation of this Policy.
- 9.2 The risk management and internal control system will be subject to regular audits to ensure it is operating satisfactorily and in compliance with the Policy.
- 9.3 **AVI Group** recognises that managing an anti-bribery and anti-corruption programme is a continuous process which requires systematic review and monitoring to ensure its objectives are met. **AVI Group** and the Board shall jointly review and monitor compliance of the Policy regularly or when there are changes in legislation or business environment which may impact **AVI Group**'s businesses locally or overseas. Primary objective is to ensure the Policy remains relevant and appropriate for **AVI Group** based on the nature and size of its business activities.
- 9.4 All Directors and Employees will be notified in writing of any material revisions to this Policy.

APPENDIX 1

GIFTS & HOSPITALITY GUIDELINES

	Hotel	Property	Travel
Gifts & Hospitality	<p>Example of Gifts and Hospitality are as follows, but not limited to:</p> <ul style="list-style-type: none"> i) Cash ii) Travel / lodging iii) Appropriate & reasonable meals / entertainment iv) Tickets to events v) Favourable terms / discounts on products / services for recipient which are available for all AVI Group's employees vi) Merchandise (e.g. gift hampers / collectibles / etc.). <p>AVI Group has adopted a "No Gift" policy where Group Directors and Employees, family members are prohibited from, directly or indirectly receiving gifts under the name of AVI Group.</p> <p>AVI Group requires Directors and Employees to abide by this policy to avoid conflict of interest or the appearance of conflict of interest for either party in on-going or potential business dealings between AVI Group and external parties as the gift / hospitality can be seen as a bribe that may tarnish AVI Group's reputation or be in violation of anti-bribery and anti-corruption laws.</p> <p>It is the responsibility of the Directors and Employees to inform external parties involved in any business dealings with AVI Group that the Company practices a "No Gift Policy".</p> <p>In the event of the need to give away gifts to Third Party, Directors and Employees are to request for approval from Management prior to procuring the gifts. Kindly refer to Appendix 2 for Gifts & Hospitality Request Form.</p>		

APPENDIX 2

GIFTS & HOSPITALITY REQUEST FORM

No.	Occasion (Kindly indicate date)	Recipient's Detail				Gifts	Actual / Estimated Value (RM)	Remarks
		Company Name	Recipient's Name	Recipient's Position	Department			

I, hereby confirm that, to the best of my knowledge, the above declaration on gifts & hospitality offered are true, complete & is in accordance with AVI Group's Gifts & Hospitality Guidelines.

	Prepared by	Acknowledged by	
		Head of Division / Company	Head of Human Resource
Employee Name			
Designation			
Division / Dept			
Date			
Signature			

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APPENDIX 3

ANTI-BRIBERY & ANTI-CORRUPTION DECLARATION LETTER BY EMPLOYEE
For Avillion (AVI) Group

I, _____, hereby declare that I have read and understood **AVI Group**'s Anti-Bribery and Anti-Corruption Policy ('Policy') and the duties and responsibilities required of me in relation to the said Policy.

I will abide by the requirements and provisions set out in the said Policy which shall be read together and form part of my employment contract with **AVI Group**.

I confirm that in the course of my employment with **AVI Group**, I will :-

- a) take a zero-tolerance approach to bribery and corruption practices and observe ethical standards in my company / employment business activities and agree that neither it / I nor any associated person will offer, promise or accept any payments or gifts (as outlined in the Policy) to or from any person (directly or indirectly) for personal interest or for the purpose of influencing a business decision;
- b) abide to the 'No Gift' policy as set out by **AVI Group**;
- c) not engage in any activity, practice, or conduct which shall constitute an offence under the Act or equivalent laws;
- d) comply with all applicable laws, regulations, and sanctions relating to Anti-Bribery and Anti-Corruption including but not limited to the Malaysian Anti-Corruption Commission Act 2009 ('Act') or any equivalent laws which my company / I am subject to; and
- e) comply with relevant policies and procedures designed to promote and achieve compliance with applicable Anti-Bribery and Anti-Corruption laws. I understand that if I am a party to any breach of the said Policy during the term of my employment, then it can be regarded as a major misconduct which may result in disciplinary action, up to and including dismissal against me.

Name :
NRIC No. :
Company :
Designation :
Date :

APPENDIX 4

ANTI-BRIBERY & ANTI-CORRUPTION DECLARATION LETTER BY VENDOR
For Avillion (AVI) Group

I, _____, NRIC / Passport No. _____, being the Company Director / authorised representative of _____ (Company / Business Name) bearing Registration No. _____ (MOR / PKK / CIDB / ROS / ROC / ROB / Others), (hereinafter the '**Vendor**') hereby :-

1. DECLARE THAT :

- a) The Vendor and its directors, officers and employees are in compliance with all applicable laws, statutes, regulations and codes relating to Anti-Bribery and Anti-Corruption Policy (the '**Relevant Laws**');
- b) Neither the Vendor nor any of its directors, officers or employees who may be involved in the Business Transaction(s) has been convicted of any offence involving bribery or corruption or fraud; nor, to the best of the Vendor's knowledge, is any such person the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence under the Relevant Laws; and
- c) The Vendor did not, either directly or indirectly, promise, offer or give any bribe / gift or an improper advantage (whether financial or otherwise) to any person in **AVI Group** (including its subsidiaries and related companies) or any other person representing **AVI Group** as an inducement, incentive, reward, gift or bonus for being selected for the Business Transaction(s).
- d) I / the Company / any director / shareholder / employee of the company / immediate family member do not personally, have interest or relationship or any connection with any person(s) who is / are involved in the Business Transaction(s) which may actually or potentially result in a conflict of interest.

2. UNDERTAKE THAT :-

- a) The Vendor will not, either directly or indirectly, promise, offer or give any bribe / gift or an improper advantage (whether financial or otherwise) to any person in **AVI Group** or any other person representing **AVI Group** as an inducement, incentive, reward, gift or bonus to be selected and / or for any other purpose connected to the Business Transaction(s);

APPENDIX 4

ANTI-BRIBERY & ANTI-CORRUPTION DECLARATION LETTER BY VENDOR
For Avillion (AVI) Group (Cont'd)

- b) The Vendor will not, either directly or indirectly, promise, offer or give any bribe / gift or an improper advantage (whether financial or otherwise) to any government official or private individual so as to obtain or retain a business advantage on behalf of **AVI Group** during the carrying out of the Business Transaction(s);
- c) The Vendor shall abide and comply with the 'No Gift' policy as set out by **AVI Group**, where no gift is to be given to any employee of **AVI Group**;
- d) The Vendor will comply with the relevant provisions of **AVI Group's Anti-Bribery and Anti-Corruption Policy ('ABAC')** which is made available online at www.avillionberhad.com (whatsapp: +6016 226 6836 or email to whistleblower@avillion.com); and
- e) If contraventions or investigations of the type described in sections 1(b), 2(a) and 2(b) above have occurred, the Vendor will forthwith supply full details of them to **AVI Group**.

3. AGREE THAT :-

- a) In the event that the Vendor, its directors, officers or employees is in breach of any of the above sections, the following actions may be taken by **AVI Group** :-
 - i). Immediate revocation of the contract award for the Business Transaction(s) without any liability whatsoever on the part of **AVI Group** to the Vendor and / or its directors, officers or employees; and / or
 - ii). Immediate termination of the contract for the Business Transaction(s) without any liability whatsoever on the part of **AVI Group** to the Vendor and / or its directors, officers or employees,

without prejudice to any other rights or remedies **AVI Group** may have or any other appropriate action which **AVI Group** may seek as it deems appropriate, under the terms of the applicable contract / tender or applicable laws and regulations.

Should any person attempt to solicit any bribe / gift or advantage (whether financial or otherwise) from the Vendor or any other individual connected to the Vendor either as an inducement or incentive to be selected or as a reward, gift or bonus for being selected in the Business Transaction(s), or where the Vendor has reasonable grounds to suspect any breach of the obligations in this letter or the relevant provisions of the **ABAC**, the Vendor will report such act immediately in accordance with the **AVI Group's Whistleblowing Policy** available online at www.avillionberhad.com.

ANTI-BRIBERY & ANTI-CORRUPTION DECLARATION LETTER BY VENDOR
For Avillion (AVI) Group (Cont'd)

For and on behalf of the Vendor,

Yours sincerely,

Name :

NRIC / Passport No :

Position :

Name of Company :

Company Stamp :

Received and Acknowledged by :

Name :

NRIC / Passport No :

Position :

Name of Company :

Note :-

- 1) 'Business Transaction(s)' is (are) defined as Contracts, Purchase Orders, Tenders and Quotations.
- 2) 'Immediate family member' shall include spouse, parents, parents-in-law, brothers, sisters, brothers / sisters-in-law, anynatural, adopted or stepchildren