



C.I. HOLDINGS BERHAD ANTI-BRIBERY AND CORRUPTION POLICY

Anti-Bribery Management System (ABMS)

This C.I. HOLDINGS ANTI-BRIBERY and CORRUPTION (ABC) Policy is NOT intended to provide definitive answers to all questions regarding the bribery and corruption. Rather, this policy is intended to provide group personnel with a basic introduction as to how C.I. HOLDINGS combats bribery and corruption in furtherance of C.I. HOLDINGS' commitment to lawful and ethical behaviour at all times.



ABMS MANUAL

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1.0 INTRODUCTION

C.I. HOLDINGS BERHAD [Company No.: 197801000889 (37918-A)] and its subsidiaries (hereinafter referred to as “CIH” or “CIH Group” or “the Group”) are committed to making our group a leading manufacturer and packer of all types of edible oils and manufacturer and traders of water taps and other plumbing accessories.

To increase our presence along the entire industry’s supply chain, CIH Group requires a focused, long-term approach and the need to balance risks and rewards while adhering to the highest standards of business ethics and integrity.

This CIH Group’s Anti-bribery and Corruption Policy (hereinafter referred to as the “ABC Policy”) elaborates upon those principles, providing guidance to personnel concerning how to deal with improper solicitation, bribery and other corrupt activities and issues that may arise in the business affairs.

CIH Group personnel’s compliance with and support for this ABC Policy is vital to CIH Group’s continued success. Failure of compliance to this policy may have severe consequences for the Group and may result in disciplinary action against CIH Group personnel involved.

**References to CIH Personnel shall include personnel employed by any of the subsidiaries of C.I. Holdings Berhad as well.*

2.0 CIH GROUP’S ANTI-BRIBERY AND CORRUPTION COMMITMENT

CIH is committed to conducting business dealings with ethics and integrity. This means avoiding practices of bribery and corruption of all forms in the Group’s daily operations.

CIH has adopted a zero-tolerance approach against all forms of bribery and corruption and takes a strong stance against such acts. CIH personnel will NOT suffer discrimination or disciplinary action for refusing to participate in any activity which is reasonably judged to involve bribery and corruption but NOT mitigated by the Group.

This ABC Policy leverages on the principles set out in the CIH Employee Handbook. Full compliance to both the Employee Handbook and this ABC Policy is mandatory.

3.0 OBJECTIVE

This CIH ABC Policy is NOT intended to provide definitive answers or solutions to all questions regarding the bribery and corruption. Rather, this policy is intended to provide Group personnel with a basic introduction on how CIH addresses bribery and corruption in furtherance of CIH's commitment to lawful and ethical behaviour at all times.

4.0 SCOPE

This CIH ABC Policy applies to:

a) All CIH personnel

- This CIH ABC Policy applies to both the Group Board of Directors (Executive and Non- Executive), top management and its employees (permanent and on contract), regardless of their roles or positions ((hereinafter referred to as "Personnel").
- All Personnel must comply with the CIH ABC Policy, procedures and all applicable laws during employment with CIH.
- Head of Division, Department and Unit are responsible to communicate with subordinates and ensure their compliance to this ABC Policy within their respective business functions / units.

b) CIH's Business Associates

- This ABC Policy applies to the Group's business associates, which includes joint venture & consortium partners, vendors, contractors, sub-contractors, consultants, agents, representatives, tenants and other intermediaries who are performing works or services, for and on-behalf of CIH.
- All CIH Personnel, regardless of their positions or roles, are responsible to communicate this CIH ABC Policy to their business associates.

c) Organisations with Controlled Interest of CIH Group

- This policy is applicable to organisations of which the Group has controlled interest.

- d) All parties engaging with the Group
- This CIH ABC Policy applies to all parties that are currently engaged with the Group or have intentions to engage with the Group in the future.
 - CIH will use its best endeavour and in good faith to require parties to understand and implement policies and procedures similar to that of CIH.

5.0 REFERENCES

- a) MS ISO 37001:2016 – Anti-bribery Management Systems
- b) National Centre for Governance, Integrity and Anti-Corruption (GIACC) - Guidelines on Adequate Procedures
- c) Malaysia Anti-Corruption Commission Act 2009
- d) Malaysia Anti-Corruption Commission Amendment Act 2018
- e) Malaysian Penal Code (revised 1977)
- f) Whistleblower Protection Act 2010
- g) Companies Act 2016
- h) Data Protection Act 709
- i) C.I. Holdings Berhad’s Employees’ Handbook

6.0 DEFINITIONS

The following definitions are included in this CIH ABC Policy:

No.	Term	Definition
1.	ABMS	Anti-bribery Management System.
2.	CIH ABC Policy	CIH Group Anti-bribery and Corruption Policy.
3.	Bribery	Bribery is defined as any action, which would be considered as an offence of giving or receiving ‘gratification’ under MACC Act. In practice, this means offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person in position of trust within an organisation.

No.	Term	Definition
		<p>'Gratification' is defined in the MACC Act to mean the following:</p> <ul style="list-style-type: none"> (a) <i>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;</i> (b) <i>any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;</i> (c) <i>any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;</i> (d) <i>any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;</i> (e) <i>any forbearance to demand any money or money's worth or valuable thing;</i> (f) <i>any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and</i> (g) <i>any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).</i> <p>Bribery may be 'outbound', where someone acting on behalf of the Group attempts to influence the actions of someone external, such as a Government official or client decision-maker.</p> <p>It may also be 'inbound', where an external party is attempting to influence someone within the Group such as a decision-maker or someone with access to confidential information.</p> <p>Bribery and corruption are closely related. However, corruption has a wider remit. See 'Corruption' definition below.</p>
3A.	MACC Act	<p>Means any of the following:-</p> <ul style="list-style-type: none"> a) Malaysia Anti-Corruption Commission Act 2009. b) Malaysia Anti-Corruption Commission Amendment Act 2018.

No.	Term	Definition
4.	Business Associate	An external party with whom the organisation has, or plans to establish, some form of business relationship. This primarily include clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors (<i>ISO 37001 definition</i>).
5.	Corruption	<p>For the purpose of this policy, corruption is defined primarily as any action, which would be considered as an offence of giving or receiving ‘gratification’ under the Malaysian Anti-Corruption Commission Act 2009 (MACCA) (‘Bribery’ as defined above).</p> <p>In addition, corruption may also include acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.</p>
6.	Corporate Gift	<p>Something given from one organisation to another, with the appointed representatives of each organisation giving and accepting the gift. Corporate gifts may also be promotional items given out equally to the general public at events, trade shows and exhibitions as a part of building the company’s brand. The gifts are given transparently and openly, with the implicit or explicit approval of all parties involved. Corporate gifts normally bear the company name and logo and are of nominal value.</p> <p>Examples of corporate gifts include but not limited to items such as diaries, table calendars, pens, notepads, plaques, and festive gifts such as hampers, oranges and dates.</p>
7.	Donation	Charitable contributions made to support the community.
8.	Directors	Directors include all independent and non-independent directors, executive and non-executive directors of the Group and shall also include alternate or substitute directors.
9.	Exposed Position	Exposed positions are positions delegated with management authorities (MDA) for approving budgets, appointment, procurement, expenditure and payments, and having interface with third parties such as business associates and public officials, and position identified as vulnerable to bribery through a risk assessment. Such positions may include but is not limited, to any role involving procurement or contract management; financial approvals; human resource; relations with government officials or government departments; sales; positions where negotiation with an external party is required; or other positions which the company has identified as vulnerable to bribery.
10.	Integrity Officer	Head of Integrity and Risk Management Department.

No.	Term	Definition
11.	Integrity Committee	Group Managing Director (GMD), Chief Financial Officer, Head of Corporate & Legal Affairs and Head of Integrity & Risk Management Department.
12.	Personnel	Directors and all individuals directly contracted to the companies within the CIH Group on an employment basis, including permanent and temporary employees.
13.	Conflicts of Interest	Situation where business, financial, family, political or personal interests could interfere with the judgment of persons in carrying out their duties for the organization.
14.	Controlled Organisation	An entity where CIH either has >50% of the share ownership, and has the right to appoint management.

7.0 BRIBERY AND CORRUPTION POLICY

- 7.1 All forms of bribery and corruption are prohibited. CIH upholds a zero-tolerance approach. In addition to bribery, personnel must NOT participate in any corrupt activities, such as extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.
- 7.2 This ABC Policy applies to all countries worldwide, without exception and without regard to regional customs, local practices or competitive conditions.

8.0 RECOGNITION OF LOCAL AND INTERNATIONAL LEGISLATION

- 8.1 CIH is committed to conducting its business in an ethical manner and compliance with all applicable laws and regulations in the countries where it operates.
- 8.2 These applicable laws and regulations include but are not limited to the Malaysian Penal Code (revised 1977) (and its amendments), the Malaysian Anti-Corruption Commission Act 2009 and its amendments, the Companies Act 2016.

9.0 GIFTS, HOSPITALITY & ENTERTAINMENT

- 9.1 CIH personnel are prohibited from soliciting or asking for gifts, hospitality and entertainment from business associates or other parties engaged in business with the Group or seeking to be engaged in business with the Group (“Possible Corrupting Parties”).
- 9.2 Under no circumstances may the Group personnel or their family members accept gifts in the form of cash, food hampers, gift certificates, loan repayment, commissions, coupons, discounts or any other related forms from Possible Corrupting Parties.
- 9.3 In situations where it is NOT possible to refuse or return a gift, or the refusal is likely to cause serious offence, CIH personnel shall report to Integrity Officer for decision to the treatment of the gift received.
- 9.4 The only form of allowable gifts giving to business associates and other parties engaged with CIH is corporate gifts, which is worth NOT more than RM500 per item provided always that such item will NOT improperly influence a business outcome and be perceived as bribery. Corporate gifts must NOT be provided to the same recipient for more than 3 times a year.
- 9.5 CIH personnel may accept hospitality of business associates and paying for light meals, coffee, tea, soft drinks, biscuits and sandwiches during a meeting or discussion.
- 9.6 Hospitality should NOT be accepted frequently from the same party, or during specific time periods, such as tender or contract negotiations. In any event, hospitality must NOT be received from the same party for more than 3 times a year.
- 9.7 Certain CIH personnel are allowed to offer meals to business associates and other parties engaged with CIH provided they fall within the following limited exceptions:
- a) It is business-related (i.e. only for those directly connected to the operations of the CIH).
 - b) It is not for spouses and other non-business guests.

- c) The cost of the meal does NOT exceed the allowable thresholds as per Table below.

Table 1: Job Grade vs Cost of Meal

JOB GRADE	PER EVENT
Executive Directors/Senior Management	RM5,000
Managers	RM1,000
Executives	RM500
Non-Executives	RM300

- 9.8 CIH personnel may participate in normal and non-frequent business entertainment with business associates such as sporting events, with the purpose of fostering better business relations, provided the cost in association of such entertainment is paid or shared by the Group or approved by the GMD.

10.0 CHARITABLE DONATIONS, SPONSORSHIPS & CORPORATE SOCIAL RESPONSIBILITIES

- 10.1 CIH is committed to charitable donations, sponsorships and corporate social responsibilities activities (CSR) for the well-being of the society and community.
- 10.2 It is however important that all charitable donations, sponsorships and CSR are made in accordance with the Group policies, permitted by the laws and regulations, given without the intention of influencing someone to act improperly or as a reward for having acted improperly.
- 10.3 All requests of recipient organisations for charitable donations, sponsorships and CSR must be scrutinized by the Integrity Officer and must be approved by the GMD to ensure that it fits within the Group's established criteria.

- 10.4 It is CIH's policy to prohibit Group personnel from requesting vendors for charitable donations, sponsorships and CSR to individual, their friends or relatives without getting approval from the GMD.

11.0 MONEY LAUNDERING

- 11.1 CIH prohibits practices related to money laundering, including dealing in the proceeds of criminal activities.
- 11.2 Money laundering involves the placement of illegally obtained money into legitimate financial systems in order that monetary proceeds derived from criminal activities are transformed into funds with an apparently legitimate sources, or when legitimate funds are used to support criminal activities, including financing terrorism.
- 11.3 To avoid violating anti-money laundering laws, the Group personnel are expected to always conduct due diligence on planned and ongoing relationship with business associates and third parties, to understand their business background, the origin and destination of fund and payments.
- 11.4 CIH personnel shall report any irregularities of fund source and suspicion of transactions in aiding illegal or terrorist activities, to their line manager, Head of Division and Integrity Officer for further actions.

12.0 FACILITATION PAYMENTS

- 12.1 CIH prohibits their personnel and business associates to make facilitation payments of any kind.
- 12.2 Facilitation payments are unofficial payments made to secure or expedite an action by a government official, enforcement personnel such as Police Personnel or the members of the Military or other person of authority including Custom & Excise officials for purposes of customs clearance or Immigration officials.

- 12.3 CIH personnel who received requests for facilitation payment from local or foreign public official, must take reasonable steps to verify the legitimacy of payment. If necessary, personnel shall report the incident to their line manager, Head of Division (HODiv) and Integrity Officer for seeking an advice.
- 12.4 In the event CIH personnel have made a facilitation payment under situations NOT realizing its illegitimacy, or where the payment was made so as to safeguard own, or another person's life or liberty, he/she must as soon as possible make a statement of the incident and report to the HODiv and Integrity Officer.

13.0 SUPPORT LETTERS

- 13.1 A "support letter" is a directive or decision from politician, government administration, or highly influential persons, to influence decision and request for special privileges to be given to an individual or organization for project award and application.
- 13.2 Support letters may also come in other forms, such as text messages, phone calls and e-mails.
- 13.3 CIH does NOT use support letters to request for any project award or application.
- 13.4 Likewise, CIH prohibit external parties from using support letters to influence the Group's decision-making in project award or application.
- 13.5 CIH does NOT issue support letters for person, their family and friends, and business associates.
- 13.6 CIH personnel receiving support letters should NOT promise the requestor for anything, and shall report to their line manager, Head of Division and Integrity Officer for further actions.

14.0 RECRUITMENT, PROMOTION AND EMPLOYMENT OF RELATIVES

- 14.1 CIH values the cultures of ethics and integrity, and directs its attention to the roles of culture in supporting CIH's ABC policy.
- 14.2 CIH's recruitment, training, incentive and appraisal, remuneration, promotion and transfer, and disciplinary processes for any personnel, top management and board members, are designed and updated regularly to uphold ethics and integrity.
- 14.3 CIH encourages and supports its personnel to do the right thing. When recruiting new personnel, assessment will be given to the ethical attributes of an individual.
- 14.4 CIH personnel are assessed and recognized for good behaviour and contributions to the ABC controls.

15.0 BUSINESS ASSOCIATES & THIRD PARTIES

- 15.1 All business associates acting on behalf of CIH are required to comply with this ABC Policy, CIH's Vendor Code of Conduct, and other relevant policies.
- 15.2 Where organizations of which CIH retains controlling interest, such as subsidiary, joint venture and consortium, these controlled organisations are required to implement this ABC Policy. For organisations where CIH do not have the controlling interest, they are encouraged to comply with this ABC Policy or implement their own anti-bribery and corruption controls.
- 15.3 CIH avoids dealing with business associates known or reasonably suspected for corrupt practices or is known or reasonably suspected to pay bribes.
- 15.4 Due diligence and risk assessment will be conducted on planned and ongoing business associates to have confidence that they are honest and can be reasonably expected to refrain from corrupt practices.
- 15.5 Contract terms with business associates will include clauses to enable the Group to terminate or discontinue the contractual relationships in the event business associates have been found involved in bribery and corruption.

- 15.6 Periodic review of business associates and third-parties risk assessment and due diligence are provided to check whether anti-bribery and corruption controls are effective for the existing relationships with CIH to continue.

16.0 CONFIDENTIALITY OBLIGATIONS

- 16.1 The business affairs and records of CIH, comprising operations, finance, sales and marketing, corporate services, strategic business and documents comprising procedures, processes, manufacturing methods, e-mails, letters, reports, specifications, formulae, forms, licenses, agreements or other documents or files are all confidential information belonging to CIH.
- 16.2 This information is strictly private and confidential and shall NOT be utilised, discussed with, divulged to or disclosed to persons inside or outside CIH, except by persons authorised to do so.
- 16.3 CIH personnel shall NOT, either during or after employment with CIH, disclose, divulge or utilise without appropriate authorisation any such confidential information. CIH personnel must both during and after employment, take all reasonable precautions to keep all such confidential information secret.

17.0 FINANCIAL INTEGRITY

- 17.1 CIH personnel must comply with all policies and procedures established to safeguard and support the integrity and accuracy of CIH's books, records and financial reporting. In this regard, CIH personnel must not:
- a) conceal, alter, destroy or otherwise modify CIH records or documents;
 - b) intentionally make a false or misleading entry in a record, report, file or claim (including travel and entertainment expense reports); or
 - c) fail to cooperate fully and truthfully with internal and external audits authorised by CIH.

18.0 RESPONSIBILITIES OF CIH PERSONNEL

18.1 All CIH personnel (including its directors, and directors and personnel of its controlled organizations) are assigned responsibilities and obligations relating to this CIH ABC Policy, alongside those already in existence, which includes the following:

- a) Be familiar with applicable requirements and directives of the ABC Policy and communicate them to subordinates;
- b) Promptly record all transactions and payments accurately and in reasonable details;
- c) Stay vigilant to suspicious transactions and report to immediate superiors for guidance for the next course of action;
- d) Promptly report any attempted, suspected, and actual misconduct and violations;
- e) Be cooperative and attend anti-bribery and corruption training as required; and
- f) Not misuse his/her position in CIH for personal advantage.

18.2 When dealing with external parties (such as a client) on behalf of CIH, CIH personnel shall not:

- a) Offer, promise or make any attempt to dishonestly influence a person of external party's decision, by directly or indirectly offer, make or promise of corrupt payments, in cash or in kind;
- b) Be involved in any discussions regarding business or employment opportunities, for own personal benefit or for the person of external party's benefit;
- c) Abuse the decision-making and other delegated powers given by the top management, to illicitly secure an outcome which would be to the commercial advantage to themselves and/or the Group; and
- d) Exert improper influence to obtain personal benefits from external party.

18.3 During an active or anticipated procurement or tender exercise, CIH personnel participating in the exercise in any way whatsoever, shall not:

- a) Receive gifts, hospitality, entertainment or any kind from any external party participating, planning to participate, or expected to participate, in the procurement or tender exercise;
- b) Provide anything other than a corporate gift and hospitality to any external/third party related to the exercise;
- c) Be involved in any discussions regarding business or employment opportunities, for personal benefit, or for the person's benefit of business associate;
- d) Abuse the decision-making and other delegated powers given by the top management; and
- e) Bypass normal procurement or tender process and procedure.

18.4 CIH's HODiv and HOD are allocated responsibilities to ensure that the ABMS requirements are applied and complied within their departments or functions. They must ensure their subordinates holding with 'Exposed Positions' to attend the relevant ABMS trainings.

19.0 DECLARING CONFLICTS OF INTEREST

19.1 Conflicts of interest situations arise when personal interests interfere with the judgement of persons in carrying out their duties for CIH.

19.2 To promote an openness and transparency for managing actual, potential, or perceived conflicts of interest, CIH personnel shall declare any actual, potential or perceived conflicts of interest to his/her line manager and Integrity Officer, to ensure that all decisions made on behalf of the Group are based on an objective and fair assessment without being impacted by personal interest.

20.0 STAFF DECLARATIONS

- 20.1 All CIH personnel shall certify in writing that they have read, understood and abide by this CIH ABC Policy. A copy of this declaration shall be documented and retained by the Human Resource (HR) Department throughout the duration of employment with CIH. Staff declaration is available in the Appendix 1 of this ABC Policy.
- 20.2 The Integrity Committee reserves the right to request information regarding a person's assets in the event that the person is under suspicion or implicated in any bribery and corruption-related accusation or incident.

21.0 ANTI-BRIBERY AND CORRUPTION COMMITTEE FUNCTION

- 21.1 Integrity Committee shall have an oversight to the implementation of anti-bribery and corruption controls related to this policy.
- 21.2 Integrity Committee shall conduct regular risk assessments to identify the bribery and corruption risks potentially affecting CIH. Integrity Committee shall also review the suitability of this policy from time to time, taking into account the latest developments in the legislation as well as the evolution of industry and international standards.
- 21.3 Integrity Committee shall be an independent authority and empowered to act against misconduct, bribery and corruption, including instigating investigations whenever deemed necessary based on reasonable cause for suspicion.
- 21.4 Integrity Committee shall implement and effectively manage routine anti-bribery and anti-corruption measures as deemed appropriate to ring-fence the Group against possible legislative liabilities, as well as undertake ad-hoc measures deemed necessary based on circumstantial requirements arising during the course of operations.

22.0 TRAINING AND AWARENESS

- 22.1 An Awareness programs are planned and arranged for CIH personnel to periodically give a refreshment on the anti-bribery and anti-corruption measures, and to continuously promulgate ethics and integrity.
- 22.2 Trainings are provided on a regular basis, in accordance with level of bribery and corruption risks related to positions. Training shall be provided to personnel who are: -
- a) New to the company;
 - b) Appointed to or currently holding an exposed position; and
 - c) Board and top management.
- 22.3 Integrity Officer may recommend certain trainings be repeated for CIH personnel in any operating unit if deemed necessary based on circumstantial requirement.
- 22.4 HR Department shall document and maintain training records in collaboration with Integrity & Risk Management Department.

23.0 WHISTLEBLOWING OF POLICY VIOLATIONS

- 23.1 CIH personnel are encouraged to report any attempted, suspected, and actual misconduct such as bribery, corruption, fraud, financial impropriety, gross mismanagement, violation of this policy, violation of the Vendor Code of Conduct, or weaknesses in the anti-bribery and corruption management system.
- 23.2 Whistleblower reporting, either anonymously or otherwise in good faith on the basis of a reasonable belief, is assured of confidentiality to the reporter identification and prohibition from retaliation by CIH regardless of the outcome of any investigation.

23.3 Any concerns of attempted, suspected or actual misconduct and violation should be reported to the following disclosure channels:

- Hotline number : 603-2182 7288
- Email : johari@cih.com.my
- Post : Suite A-11-1, Level 11, Hampshire Place Office,
157 Hampshire, No.1, Jalan Mayang Sari,
50450 Kuala Lumpur

23.4 Integrity Committee shall conduct and/or may appoint an external party to conduct an investigation to the alleged misconduct and violation of this Anti-bribery and Corruption policy.

23.5 Depending on the outcome of investigation, CIH may seek remedies for misconduct, bribery and corruption, apply disciplinary actions to the Personnel or Business Associate involved, or refer the violation to the enforcement authorities.

24.0 ABMS AUDIT AND COMPLIANCE

24.1 Regular audits will be conducted to ensure Group personnel in compliance to this ABC policy. Such audits may be conducted internally by the appointed auditors or by an external party.

24.2 Non-compliance as identified by the auditors and any risk areas identified through this and other means should be reported to the top management and Integrity Committee in a timely manner.

24.3 CIH regards act of bribery and corruption a serious matter and will apply penalties for non-compliance of this ABC policy. For the Group personnel, non-compliance may lead to disciplinary actions, up to and including termination of employment.

24.4 For business associates, non-compliance may lead to penalties including termination of contract. Further legal action may also be taken in the event that the Group's interests have been harmed in consequence of the non-compliance by an individual or business associates.

25.0 CONTINUOUS IMPROVEMENT

- 25.1 CIH is committed to continually improving its policies and procedures relating to ABMS. Integrity Committee endeavours to develop and improve the integrity measures which is leading to the certification of the Group's anti-bribery and corruption procedures as adequate.
- 25.2 Regular assessments of the CIH ABC Policy should be carried out to ensure its scope, policies, procedures and controls matching the bribery and corruption risks identified by CIH.

26.0 WAIVER

- 26.1 Any deviation or waiver from this policy must be approved by the Board of Directors.