



Registration No. 197501001462 (23568-H)

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## **Anti-Bribery and Corruption Policy**

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The Board of Directors of Hubline Berhad establishes the following Anti-Bribery and Corruption Policy which is applicable to all the Directors and employees of Hubline Berhad and its subsidiaries (collectively referred to as the "Group"), regardless of locations, roles or responsibilities.

The Group and any third parties that act on behalf of the Group are committed to not engaging in bribery or corruption activities.

This Policy explains our individual responsibility to comply with anti-bribery and corruption laws and to ensure that any third parties that we engage to act on our behalf, do the same.

### **1. Statement of Policy**

The Group is committed to complying with all applicable anti-bribery and corruption laws, and regulations and the high level of integrity and ethical standards in all of its business practices.

The penalties for violating these laws can be severe, both for the Group and for the individuals involved, including significant corporate and individual fines and imprisonment. Any violation of this Policy may result in disciplinary action, up to and including dismissal in appropriate circumstances.

The objective of this Policy is to define unacceptable behavior relating to bribery and corruption, and to direct its identification and prevention.

This Policy should be read in conjunction with the following policies of the Company:

- The Code of Conduct and Ethics; and
- The Whistleblowing Policy.

### **2. What is a Bribe?**

A bribe means:

- The offering, promising, giving, authorising, requesting or receiving of a financial or non-financial advantage or anything of value;

- An act of giving or receiving a financial or other advantage in connection with the “improper performance” of a position of trust, or a function that is expected to be performed impartially or in good faith.

### **3. What is Corruption?**

Corruption means any conduct of any person (whether or not a public official) that adversely affects, or that could adversely affect, either directly or indirectly, the honest or impartial exercise of official functions by any public official, any group or body of public officials or any public authority.

### **4. Facilitation Payments**

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, e.g. processing papers, issuing permits and other actions of an official in order to expedite performance of duties of a non-discretionary nature (i.e. which they are already duty or employment bound to perform). The payment or other inducement is not intended to influence the outcome of the official’s action, only its timing.

### **5. Principles**

**All the Directors and employees of the Group are expressly prohibited from engaging in any kind of facilitation payment, bribe or corrupt behavior.**

**All the Directors and employees of the Group must have a general awareness of bribery and corruption risks and their responsibilities related to managing these risks.**

The Group and the management of the Group are committed to supporting this Policy and its implementation through the following:

- Ongoing training to all the Directors and employees of the Group of their legislative, regulatory and employment obligations with respect to bribery and corruption;
- Providing confidential avenues for the internal reporting of suspected breaches of such legislative, regulatory and employment obligations by the Directors and employees of the Group;
- Providing compliance and regulatory advice to management and the Group with respect to risk management of bribery and corruption within the Group; and
- Providing support to management and human resources in identifying and managing any suspected breaches concerning allegations of bribery and corruption.

## **6. Gifts and Hospitality**

The act of exchanging business gifts and receiving corporate hospitality can play an appropriate role in building or maintaining business relationships. However, gifts and hospitality are problematic if they create actual or perceived conflicts of interest, or otherwise appear to influence a business decision.

Accepting gifts, favours or services from a current or potential customer, competitor, supplier or service provider is prohibited if that benefit is a type or amount which has the potential to influence a person's business decision. Functions such as procurement or sales personnel must take extra care. More strict requirements might apply and these groups might not be allowed to accept or give any gifts or hospitality under certain circumstances or policies and procedures applicable to that group.

Gifts are only permitted if they are:

- Reasonable;
- Infrequent;
- In good taste;
- Unsolicited;
- Not cash or cash equivalent;
- Not given with an intent to influence a business decision;
- Could not be perceived by others to improperly influence a business decision;
- Not excessive in value or quantity; and
- Would not embarrass the Group if it was brought to public attention.

## **7. Third Parties**

The Group could be held responsible for the actions of a third party (e.g. agent, contractor, supplier, joint venture partner) acting on its behalf. As such, care must be taken to ensure that those third parties do not engage attempt to engage in bribery.

## **8. Political Donations**

Subject to any applicable laws and regulations which govern political contribution, the Group may make contribution to political parties or candidates. All political contributions require approval from the Chief Executive Officer or Managing Director. All donations must be transparent and properly recorded in the Group's books and records.

## **9. Charitable Contributions**

Charitable support and donations are acceptable, and are indeed encouraged, whether of in-kind services, knowledge, time, or direct financial contributions.

However, the Directors and employees must be careful to ensure that all charitable donations are not used as a scheme to conceal bribery.

All charitable contributions require approval from the Chief Executive Officer or Managing Director. All charitable contributions must be transparent and properly recorded in the Group's books and records.

#### **10. Record-Keeping**

The Group must keep financial records and have appropriate internal controls in place which will provide evidence of the business reason for making payments to third parties with overall accountability for the keeping of financial records vested in the management of the Group.

#### **11. How to Raise a Concern**

The Group is committed to ensuring that all the employees have a safe, reliable and confidential way of reporting any suspicious activity without fear of actual or possible adverse consequences. All employees are encouraged to whistle blow or report their concerns through the mechanism set out under the Group's Whistleblowing Policy.

#### **12. Monitoring and Review**

The Directors and employees of the Group are expected to understand and comply with the Malaysian Anti-Corruption Commission Act 2009 ("MACC Act"), including any amendment thereof.

The Board of Directors will monitor compliance with this Policy and will review the Policy at least once every three years to ensure that it continues to remain appropriate and relevant.